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MS. MORGAN HUMPHREY  
MS. SAMANTHA KOBOR

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1 (WHEREUPON, the witness was duly  
2 sworn.)

3 KEITH INGRAM,  
4 called as a witness herein, having been first duly  
5 sworn, was examined and testified as follows:

6 EXAMINATION

7 BY MR. FREEMAN:

8 Q. My name is Dan Freeman. This is the  
9 general election deposition of Mr. Keith Ingram in the  
10 matter of La Union Del Pueblo Entero v. Abbott, U.S.  
11 District Court for the Western District of Texas,  
12 docket No. 5:21-cv-844.

13 Again, as you know, my name is Dan Freeman.  
14 I represent the United States in this matter. With me  
15 here today are Mr. Richard Dellheim and Mr. Mike  
16 Stewart. And I will let everyone else introduce  
17 themselves.

18 MS. PERALES: Nina Perales for Plaintiffs LUPE,  
19 L-U-P-E, et al.

20 MS. HUNKER: Kathleen Hunker and Ethan Szumanski  
21 representing the State Defendants along with individual  
22 legislators for the purposes of legislative privilege  
23 to the extent it's raised today. With me is Adam  
24 Bitter, General Counsel for The Office of the Texas  
25 Secretary of State.

1 MR. FREEMAN: If those who are on Zoom who intend  
2 to ask questions could introduce themselves as well.

3 MR. GENECHIN: This is Victor Genecin,  
4 G-E-N-E-C-I-N, of NAACP LDF for the HAUL Plaintiffs. I  
5 do intend to ask questions.

6 MR. FREEMAN: Anyone else on Zoom who intends to  
7 ask questions today?

8 MR. FREEMAN: Thank you very much. I will ask  
9 those who are on Zoom to please put themselves on mute  
10 when you are not speaking. I will ask everyone else in  
11 the room to just remember to please silence your cell  
12 phones.

13 BY MR. FREEMAN:

14 Q. Mr. Ingram, I know you have been deposed  
15 many times in this matter and others. We do need to go  
16 through a few quick ground rules for the record. The  
17 deposition will proceed as a question and answer. The  
18 court reporter will be recording my questions and your  
19 answers so it's important for both of us to articulate  
20 rather than gesture. Do you understand?

21 A. I understand.

22 Q. The purpose of the deposition is to obtain  
23 your full testimony regarding your opinions -- or  
24 excuse me -- your knowledge with respect to the matters  
25 in this case. So I need you to provide full and



1 complete answers. Do you understand?

2 A. I do.

3 Q. I may not always be clear. If you don't  
4 understand, will you please ask me to restate the  
5 question in a clear manner?

6 A. I will.

7 Q. If you need a break, will you let me know  
8 and we'll finish the question and see about a break?

9 A. Sure.

10 Q. If you need coffee -- I see you already  
11 have water -- please let me know between questions, and  
12 we will see about getting you some. Okay?

13 A. Okay.

14 Q. If you want to talk to your attorney,  
15 that's fine, but if there is a question pending or you  
16 are in the middle of an answer, let's finish up the  
17 answer first and then you can talk with your attorney.  
18 Will that work?

19 A. Sure.

20 Q. Sometimes you will remember things later in  
21 the day. If that happens, let me know while it's on  
22 your mind and we can add to the record. Will you do  
23 that?

24 A. I will.

25 Q. I will give you a chance to do that towards

1 the end as well.

2 Sometimes after we have been talking for  
3 awhile, you realize a prior answer was not entirely  
4 accurate. If you realize that, will you let me know so  
5 we can correct the record?

6 A. I will.

7 Q. Sometimes while you are answering, you may  
8 think of a document that will help you remember or help  
9 you answer more accurately. If you do, will you let me  
10 know?

11 A. I will.

12 Q. We may have the document here. If not, we  
13 may be able to help you get it. I see that you also  
14 have a copy of the Election Laws of Texas 2022 edition  
15 in front of you. Can I ask you, do you intend to  
16 refresh your recollection, if need be?

17 A. If need be, yes, sir.

18 Q. Mandatory question. Are you on any  
19 medication or drugs of any kind that might make it  
20 difficult for you to answer or understand my questions?

21 A. I'm not.

22 Q. Is there any other reason you can think of  
23 why you would not be able to answer my questions fully  
24 and accurately?

25 A. Seasonal allergies are making my throat

1 dry, but that's about it.

2 Q. Well, we'll make sure you have enough  
3 water. We can take breaks if need be. If truly  
4 necessarily, we'll make a Claritin run.

5 Last thing. I want to remind you that you  
6 are under oath and subject to federal penalties for  
7 giving false or misleading testimony. So it's  
8 important to answer my questions truthfully, accurately  
9 and completely. Do you understand?

10 A. I do.

11 Q. Any questions so far?

12 A. No, sir.

13 Q. All right. Just for the record, are you  
14 represented by counsel here today?

15 A. I am.

16 Q. Who is that?

17 A. Kathleen Hunker, and Adam Bitter is our  
18 general counsel for our agency.

19 Q. Without going into the substance of any  
20 discussions you had with counsel, what did you do to  
21 prepare for this deposition?

22 A. Did meet with Kathleen and Ethan a couple  
23 of times, and reviewed some documents.

24 Q. What were those documents?

25 A. They were our answers to discovery, I

1 believe, the most recent set of discovery questions,  
2 interrogatories, request for production, request for  
3 admission. I also reviewed our results from the  
4 comparison that we did in December after the general  
5 election in '22. So that we tried to harvest more  
6 driver's license numbers. And I looked at the  
7 spreadsheet for the mail ballot rejection rates for all  
8 of the elections in '22 including the general.

9 Q. Do you know --

10 A. Then a few mass emails that we sent over  
11 the summer.

12 Q. Do you know if that spreadsheet from mail  
13 ballot rejection rates has been produced in this  
14 litigation?

15 A. As far as I know it was, yes.

16 MS. HUNKER: It was.

17 BY MR. FREEMAN:

18 Q. Was anyone else present besides Kathleen  
19 and Ethan during sessions?

20 A. In the first session, Adam Bitter was  
21 there. The next two Zena was there as deputy general  
22 counsel.

23 Q. I see. Thank you.

24 Did you bring any documents with you here  
25 today besides the Election Laws of Texas Manual?

1 A. I did not.

2 Q. Did you speak with anyone else about your  
3 deposition today outside of your immediate family?

4 A. I did. I talked to Christina Adkins in our  
5 office, I talked to Kristi Hart, and I talked to Donna  
6 Davidson at the Republican Party of Texas.

7 Q. What did you discuss with Ms. Davidson?

8 A. The same thing that I talked to Christina  
9 about. There was an incident with regard to a poll  
10 watcher in Northern Hidalgo County. For the life of me  
11 I can't remember any details, neither could Christina,  
12 and neither could Donna.

13 Q. Anything else?

14 A. That's it.

15 Q. Okay. So since we last spoke in April of  
16 2022 has your role in the office of the Texas Secretary  
17 of State changed?

18 A. It has.

19 Q. What's your current title?

20 A. I'm not sure what the title is. I think  
21 it's project manager or special projects. I have been  
22 designated to work on one project.

23 Q. What's that project?

24 A. The project is potentially replacing the  
25 ERIC system that we have that we're currently using to

1 use to compare voter registrations across state lines.

2 Q. What was the impetus for your change in  
3 role?

4 A. We had an organizational hearing at the  
5 Texas house for the House Elections Committee on March  
6 10 or March 9, and then the Secretary was not pleased.  
7 She thought that my exchange with Representative  
8 Swanson was indicator that maybe it would be good for  
9 her and for me to change roles.

10 Q. What was the impetus for the creation of  
11 the role that you are now in?

12 A. Well, we have been discussing -- there is  
13 legislation that would require us to leave the ERIC  
14 system, Electronic Registration Information Center, and  
15 if any of that passes then we still have a law, legal  
16 obligation to compare voter roles across state lines.  
17 So we have a need to figure out what comes next if  
18 ERIC -- if we have to withdraw from ERIC.

19 Q. In your new role do you report to the  
20 acting director of the elections division?

21 A. Yes.

22 Q. That's Ms. Adkins?

23 A. It is.

24 Q. In your new role will you have any role in  
25 the implementation of SB 1's mail voting requirements

1 in future elections?

2 A. I will not. I might be asked for advice.  
3 I might be asked for research, but that would be the  
4 limit of it.

5 Q. So at this time would it be fair to say  
6 that your knowledge concerning implementation of SB 1's  
7 mail voting requirements is strictly looking back at  
8 past elections, and not looking forward as to planned  
9 changes?

10 MS. HUNKER: Objection, form.

11 BY THE WITNESS:

12 A. I would agree with that.

13 BY MR. FREEMAN:

14 Q. Would it be fair to say you do not have  
15 personal knowledge about future improvements to  
16 implementation of SB 1?

17 MS. HUNKER: Objection, form.

18 BY THE WITNESS:

19 A. Well, I don't know what you mean by  
20 improvements. I know that, you know, we are always  
21 planning and preparing for the next election. That  
22 began immediately after November 2022 we began  
23 preparing for 2024. And so obviously I'm aware of  
24 those discussions.

25 BY MR. FREEMAN:

1 Q. Okay. Are you no longer a part of the  
2 discussions in terms of planning for the next election  
3 and implementation of SB 1?

4 A. Well, I don't know because right now it's  
5 all legislation all of the time. We will pick up the  
6 planning discussion again this summer.

7 Q. Well, you guessed my next topic. Did you  
8 testify before the Texas Legislature in the interim  
9 between the third special session of the 87th leg and  
10 the opening of the 88th Texas legislature?

11 A. I don't remember. Did we have an interim  
12 hearing and house selections? I know there was one  
13 scheduled in Senate State of Affairs, but they  
14 cancelled, so I don't know. I don't know if I had a  
15 house -- can you tell me if I did?

16 Q. I don't know.

17 A. I don't think we had an interim hearing.

18 Q. So not to your knowledge?

19 A. Not to my knowledge.

20 Q. Just to close the loop. Did you help any  
21 other staff of the elections division prepare for  
22 testimony during the interim between the 87th  
23 legislature and the opening of the 88th?

24 A. No.

25 Q. Are you aware of any other instances when



1 staff of the elections division testified before the  
2 Texas Legislator between 87th Legislature and opening  
3 of the 88th?

4 A. I'm not.

5 Q. Since the opening of 88th Texas Legislator,  
6 have you testified before any committee of Texas House  
7 or Texas Senate?

8 A. I have.

9 Q. Which committee?

10 A. House elections.

11 Q. That's it?

12 A. That's it.

13 Q. Was that on March 9 you said?

14 A. It was.

15 Q. Was that the only time you testified?

16 A. It was.

17 Q. Since the opening of the 88th Texas  
18 Legislature, have any other staff of the elections  
19 division testified before any committee of the Texas  
20 House or Texas Senate?

21 A. Yes, Christina Adkins has.

22 Q. Which committee?

23 A. House Elections and Senate State Affairs,  
24 and I believe that she was called up in the House.  
25 There is a special committee on security. I don't know

1 if she was called up in that. There was elections bill  
2 there, but I don't know if she actually had to testify.

3 Q. What's a sec -- did you -- sorry.

4 A. Oh, she did have to testify. It was on  
5 Tuesday, that's right. Tuesday a week ago.

6 Q. Did you help her prepare for any of those  
7 committee hearings?

8 A. We discussed some of the bills that were  
9 going to get heard at some of those hearings just  
10 generally.

11 Q. Did any of those bills impact or modify the  
12 provisions of SB 1?

13 A. Yes.

14 Q. Which one is that?

15 A. Well, it's not a direct impact on SB 1. It  
16 was more modification of House Bill 1382 in the regular  
17 session of last time, but it was a Bucy bill and house  
18 elections that modifies the requirements for accessing  
19 the ballot tracker.

20 Q. Is that HB 357?

21 A. I don't know.

22 Q. Anything else?

23 A. I think that might be it.

24 Q. What's a Secretary of State clean up bill?

25 A. That's usually we will have a bill with

1 some suggested small tweaks and changes throughout the  
2 election code to make it more harmonious or to get rid  
3 of obsolete language. We don't have a clean up bill  
4 this time.

5 Q. Getting ahead of me, which is helpful.

6 At any time did you expect to testify on  
7 March 16 before the House Elections Committee?

8 A. No.

9 Q. Let's turn to March 9 hearing. During your  
10 testimony before the House Elections Committee on March  
11 9, did you testify concerning the statewide mail ballot  
12 rejection rate in Texas; do you recall?

13 A. I did.

14 Q. Did you say that it was under 3 percent?

15 A. I did for the general election, yes.

16 Q. Am I correct this figure represents only  
17 final rejections of mail ballots?

18 A. That's correct.

19 Q. Does it exclude those that were rejected,  
20 then cured?

21 A. It does.

22 Q. Does it exclude those that were rejected,  
23 then cancelled?

24 MS. HUNKER: Objection, form.

25 BY THE WITNESS:

1           A.       You mean if a voter decided to vote in  
2 person and cancelled the mail ballot?

3           Q.       Yes.

4           A.       I don't know.

5           Q.       Do you know if it excludes any other forms  
6 of rejections?

7           A.       It shouldn't. I mean ballots that came in  
8 late aren't technically rejected, they are just late.

9           Q.       Did you testify to the notion that you  
10 expected that the number of statewide mail ballot  
11 rejections would continue to improve as you go forward  
12 in implementation of SB 1?

13          A.       That's my belief.

14          Q.       What's your basis for that belief?

15          A.       The trend that we've got so far, and past  
16 experience.

17          Q.       Why do you expect that the trend will  
18 necessarily continue?

19          A.       Because voters get more used to it and  
20 ballot boards get more used to it as it goes through  
21 election, continuous elections.

22          Q.       With respect to voters, are there a  
23 different set of voters in every election that are  
24 eligible to vote by mail in Texas?

25          A.       Well, yes, I presume so.

1 Q. New voters turned 65?

2 A. But there is overlap as well. People that  
3 voted by mail continue to vote by mail.

4 Q. Will the new voters who are eligible have  
5 had an opportunity to learn about the process?

6 A. Well, they will learn about it as they vote  
7 by mail for the first time.

8 Q. But the first time they won't have had  
9 experience or a learning curve?

10 MS. HUNKER: Objection, form.

11 BY THE WITNESS:

12 A. They have peers who experience and a  
13 learning curve. They talk to each other at Sunday  
14 school, they talk to each other at church, and at the  
15 rotary club. So the fact is that the experience of all  
16 of the voters increases even as new voters vote by  
17 mail.

18 BY MR. FREEMAN:

19 Q. With respect to the ballot boards, were  
20 there errors of any kind by the ballot boards that  
21 contributed to the rejection rate in the November  
22 general election?

23 A. I don't know for sure because, you know,  
24 obviously we are not on the ground other than in a few  
25 counties observing the ballot boards. Anecdotally I

1 heard some ballot boards weren't comparing signatures  
2 at all, and some ballot boards were still giving  
3 rigorous examination of signatures. So those two  
4 things probably offset each other.

5 Q. So what further learning by the ballot  
6 boards do you expect will contribute to reductions of  
7 the mail ballot rejection rate?

8 A. We have been training -- doing direct  
9 trainings for ballot boards for a couple years now and  
10 we will continue that. And in the context of that  
11 training, we talk about the rebuttable presumption  
12 that's in place after SB 1.

13 So, you know, if a signature -- if a voter  
14 has a number on their carrier envelope that matches a  
15 number in voter registration record, and then there is  
16 a rebuttal presumption that signatures are of the same  
17 voter. Of course we know as lawyers rebuttal  
18 presumption means it shifts the burden of proof. Well,  
19 ballot boards don't think that way. But they do need  
20 to understand the signatures are starting from a  
21 position of you've got to accept it unless there is  
22 evidence to reject it. So that doesn't mean you don't  
23 look at the signature at all. It doesn't mean you do  
24 the same level of comparison that you would have done  
25 before.

1 Q. Is there any learning by the ballot boards  
2 that you think you anticipate will lead to reductions  
3 in rejections based on the driver's license numbers or  
4 Social Security number requirement of SB 1?

5 A. Yes, I think as the ballot boards get more  
6 used to this they will accord the number the  
7 appropriate way. The number is designed to take the  
8 place of a less objective measure, which is the  
9 signature. So they -- as they rely on the number and  
10 then give the signature the weight it's supposed to  
11 have and only overcome it if there is some sort of  
12 evidence to overcome it then I think more ballots will  
13 get accepted.

14 Q. Were some ballot boards not recording the  
15 information the appropriate way.

16 A. No. They weren't giving it the weight it's  
17 supposed to be given.

18 Q. I see. Any rejection -- just so I'm clear.  
19 Any reduction in the mail ballot rejection rate based  
20 on learning from the ballot boards will be related to  
21 this signature, and not a reduction in rejections for  
22 failure to match a number for the driver's license  
23 field or Social Security number field?

24 MS. HUNKER: Objection, form.

25 BY THE WITNESS:

1           A.           That is not exactly true, but because they  
2 also have to integrate the early voting clerk process  
3 from 86011D. From previous law, not SB 1, early voting  
4 clerk has the ability to intervene if a voter has some  
5 sort of facial compliance issue on their carrier  
6 envelope. What we have discussed with counties and  
7 with ballot boards is that if a ballot board sees  
8 something that could be corrected by the early voting  
9 clerk, they can pass that carrier envelope back to the  
10 early voting clerk. You know, something like missed  
11 number or mismatched number. Then the early voting  
12 clerk can have either a personal trip to the voter or a  
13 telephone call to the voter, email to the voter. They  
14 can do all of those things that the ballot board can't  
15 necessarily do. They have more flexibility in talking  
16 to the voters and curing the problem.

17                   So as we communicate that to the ballot  
18 boards, I expect that there is going to be more of a  
19 shift from the ballot board whenever they have got a  
20 preliminary rejection back to the early voting clerks  
21 because the early voting clerks has more flexibility in  
22 dealing with that preliminary rejection and getting the  
23 voter successfully in place with the vote. So they  
24 want to make sure that that happens. And so I think  
25 that's going to increase over time as well.



1 Q. Are you aware of any counties where the  
2 early voting clerks were not engaged in this  
3 preliminary review of SB 1 compliance?

4 A. Well, I don't know if early voting clerks  
5 are aware that they can do that. It's something that  
6 we wanted to make sure that they understood, that  
7 really the general election in '22 was the first time  
8 we had a full fledged effort into educating with regard  
9 to that. And so we expect that that education will  
10 penetrate more as we go from election to election in  
11 the future.

12 Q. Certainly early voting clerks in large  
13 counties were engaged in this effort throughout the  
14 November 2022 general election period, correct?

15 A. I don't know if every large county, but I  
16 would assume the larger counties, they are more plugged  
17 into our advice. And so yes, generally I would agree  
18 with that.

19 Q. Any improvement in terms of the actions  
20 early voting clerk be mostly concentrated in smaller  
21 counties; is that right?

22 MS. HUNKER: Objection, form.

23 BY THE WITNESS:

24 A. Most of the counties in Texas are smaller  
25 counties. We need to penetrate to the smaller

1 counties. That's the whole goal of our office's  
2 education program.

3 BY MR. FREEMAN:

4 Q. Most of the voters are in the larger  
5 counties?

6 MS. HUNKER: Objection, form.

7 BY THE WITNESS:

8 A. Agree with that.

9 BY MR. FREEMAN:

10 Q. Do you expect that rejections based on the  
11 mail ballot provisions of SB 1 will ever go away  
12 entirely?

13 A. I think that, you know, rejections happen  
14 for all kinds of reasons. There is always going to be  
15 rejections in an election, yes.

16 Q. Has your office responded to any legislator  
17 request for a county by county breakdown of November  
18 2022 rejection rates?

19 A. Yes.

20 Q. Have you produced that document in this  
21 litigation?

22 A. We have.

23 Q. Did you testify in the March 9 hearing that  
24 you do not know the breakdown of the reasons for mail  
25 ballot rejections in November 2022 election?

1           A.           We know what the counties have told us.  
2           Experience indicates that's not entirely accurate. If  
3           you wanted more accurate assessment of the reasons you  
4           would need to talk to the counties.

5           Q.           Did you pull together that information for  
6           any legislators after the hearing?

7           A.           Did not.

8           Q.           Did you testify at the March 9 hearing that  
9           a county's inserts and mail ballot packages were  
10          helpful in reducing mail ballot rejection based on SB  
11          1?

12          A.           I did.

13          Q.           To your knowledge, how many counties  
14          included inserts of this type into mail ballot  
15          packages?

16          A.           I don't know. A lot. Most. I don't know.  
17          It's not something we have any oversight over. It's  
18          something we can suggest.

19          MR. FREEMAN: If we could mark this document as  
20          Exhibit 1.

21                               (WHEREUPON, a certain document was  
22                               marked Deposition Exhibit No. 1,  
23                               for identification, as of 3/28/23.)

24          BY MR. FREEMAN:

25          Q.           Mr. Ingram, what's this document?

1           A.       It's answers to interrogatories, most  
2 recent set.

3           Q.       Is this one of the documents that you  
4 reviewed in preparation for your deposition?

5           A.       It is.

6           Q.       If you could turn to page 4, the answer to  
7 interrogatory No. 11 on to page five. Does this  
8 refresh your recollection as to which counties included  
9 supplemental materials in the mail ballot package?

10          A.       This question asked about ones we reviewed.  
11 So these are the ones we reviewed. That's not the only  
12 ones that used an insert. I know Travis did. I know  
13 Bastrop did. We talked to them about it.

14          Q.       How many did your office review?

15          A.       The four that are in answer to that  
16 interrogatory that we know of.

17          Q.       How many additional counties are you aware  
18 of that included supplements in the mail ballot  
19 package?

20          A.       It's a lot. I mean I don't know.

21          Q.       You said Travis, Bastrop. How many others?

22          A.       Chambers, Houston. I mean there is a lot,  
23 Fannin. A lot of counties did this. This was --  
24 Potter. I mean I don't know. We don't ask them. We  
25 don't take a survey. We don't, you know, get them.

1 This was something that we talked about as a good  
2 practice. I'm sure a lot of counties did it. I don't  
3 have any idea how many.

4 MS. HUNKER: Dan, I want to clarify for the  
5 record this is his 30(b)(1) individual deposition,  
6 correct?

7 MR. FREEMAN: Yes. That was just to refresh his  
8 recollection.

9 MS. HUNKER: I wanted to make sure he was  
10 speaking on behalf of himself in this deposition as  
11 opposed to the Office of the Secretary of State.

12 MR. FREEMAN: Understood.

13 BY MR. FREEMAN:

14 Q. What characteristics of these inserts made  
15 them helpful to voters?

16 A. You know, I don't know all of the  
17 characteristics of all of the inserts because obviously  
18 we didn't look at them all. But the ones we did see  
19 were brightly colored either blue or green or orange,  
20 they were smaller than the rest of the papers so they  
21 had a tendency to fall out of the packet whenever you  
22 pulled it out of the envelope. So that drew attention  
23 to them as well.

24 Q. What information did they convey that was  
25 useful to the voters?

1 A. That you need --

2 MS. HUNKER: Objection, form.

3 BY THE WITNESS:

4 A. You need to be sure and put identification  
5 number under the flap of the envelope, and they would  
6 have a picture of the boxes at the top of the carrier  
7 envelope on the back where they are covered up when you  
8 put the flap down so they could see those boxes, see  
9 what they looked like, and get reminded they needed to  
10 fill one of them out.

11 BY MR. FREEMAN:

12 Q. Did these inserts suggest that voters  
13 include both a driver's license number and Social  
14 Security number if they had them?

15 A. I don't know. We told counties they could  
16 suggest that as a possibility, but they couldn't  
17 require it.

18 Q. Was that suggestion something that you  
19 considered to be helpful to the voters?

20 A. Absolutely, yes. We strongly suggested  
21 they do suggest it to their voters. But make sure that  
22 your voters know it's not required to put both, but  
23 they increase their chance of success if they do.

24 Q. Did you also testify before the house  
25 committee on elections on March 9 that putting the

1 resident's address in the ballot tracker log-in was  
2 keeping voters out?

3 A. Yes.

4 Q. Did you suggest that the legislator enact  
5 legislation that would replace resident's address with  
6 date of birth in the log-in requirements?

7 A. I did.

8 Q. Is this the only change that you  
9 recommended with respect to the mail voting provisions  
10 of SB 1?

11 A. I don't know what you mean by that  
12 question. In the hearing, yes.

13 Q. Have you suggested any other changes in  
14 other venues?

15 A. Yes.

16 Q. What changes have you suggested?

17 A. It's our belief that the correction  
18 process, the corrective action procedure needs to have  
19 a standardized date where anybody who's correcting a  
20 mail ballot has that date by which to fix it. The way  
21 the current law is, if the early voting clerks send  
22 back the mail ballot to the voter the voter has until  
23 7:00 p.m. on election day to get that back. And if a  
24 ballot board sends a collective action notice to a  
25 voter, they have until six days after the election to

1 come in person and fix it. So we want to match those  
2 two dates up, and we also believe that ballot boards  
3 need more time on the front end, more days to meet. So  
4 we suggested that change. And there is one other  
5 thing. I know there is three. I can never remember  
6 the third.

7 Q. Well, if you remember later.

8 A. I will.

9 Q. Thank you very much.

10 This is the type of thing that's going to  
11 bother you.

12 A. It is going to bother me. Our other  
13 suggestion is have them where they can just mail back  
14 the corrective action form and where the ballot doesn't  
15 ever leave the voting clerk's office. If the voter  
16 sends it in right now, the early voting clerk has the  
17 option of sending the ballot back to the voter. The  
18 early voting ballot board has the option of sending the  
19 ballot back to the voter. We would like to take that  
20 away and keep the ballot in the office and just send a  
21 corrective action form and have them be able to mail it  
22 back instead of deliver it in person.

23 Q. Is that the existing correction process for  
24 FPCA voters?

25 A. Yes, sort of. I mean an FPCA voter can



1 send a new signature sheet. So yes, it's kind of like  
2 that, but it's a different form. Since FPCA voters  
3 have the ability to do a signature sheet in the first  
4 place, they have more flexibility.

5 Q. Did a bill to replace resident's address  
6 with date of birth in the ballot tracker come before  
7 the House Elections Committee on March 16?

8 A. It wasn't exactly what the bill language  
9 did. The bill language made the DL or social optional,  
10 you know, pick one or the other instead of both and add  
11 date of birth and take away resident's address.

12 Q. Who testified on behalf of the Office of  
13 the Secretary of State on that bill?

14 A. Christina Adkins.

15 Q. Do you know if Ms. Adkins testified for the  
16 bill or merely on the bill?

17 A. We are never for or against legislation.  
18 It's not our office's role. We are resource witness to  
19 answer any questions about the implementation that they  
20 might have.

21 Q. If your office favors the substantive  
22 provisions of a bill you are still merely on the bill  
23 rather than for the bill?

24 A. Our office doesn't officially favor  
25 anything.

1 Q. So the changes that you suggest, the three  
2 changes to SB 1?

3 A. Well, three changes to SB 1, one to the  
4 ballot tracker, so four changes.

5 Q. How would you describe those if they are  
6 sort of suggestions coming out of your office, but you  
7 are never for a bill? How does that fit?

8 A. It's our office's role to advise on  
9 technical implementation process. And any time you  
10 have got a new thing like a corrective ballot,  
11 corrective action procedure for mail ballots, you are  
12 going to have some kinks in it that need to be worked  
13 out. It's our office's role to point out those kinks  
14 and suggest ways to work those out.

15 Whenever we implemented annual ballots by  
16 mail, the first law was House Bill 666 in 2013. It was  
17 about this long, and it just said that a voter can ask  
18 one time for all of the ballots by mail. So there were  
19 so many things. That was the hardest thing we've ever  
20 had to implement before SB 1. It was so complicated.  
21 The next session there was a bigger -- much bigger bill  
22 to correct that process and make it more uniform. And  
23 then there was another bill the next session. So any  
24 time that there is a big change like that you expect  
25 there is going to be some need to correct the

1 implementation to make it more smooth. And that's our  
2 office's role to suggest those changes. Not that they  
3 were for or against them. If you want to make a  
4 change, here's something you might think about.

5 Q. Thank you for clarifying. I appreciate it.

6 Would you say then that during your time in  
7 the elections division at the Office of the Secretary  
8 of State, SB 1 has been the hardest bill to implement?

9 A. It was by far the most comprehensive set of  
10 changes we ever had. It was every single form, every  
11 single bit of educational material, every outline,  
12 every everything had to change.

13 Q. Going back to the March 9 hearing. Did you  
14 testify that statewide there were 163 ballots rejected  
15 based on SB 1 requirements for voters who did not have  
16 either a Social Security number or a driver's license  
17 number in the system?

18 A. I did.

19 Q. Were those ballots or were those ballot  
20 requests?

21 A. Those were ballots.

22 Q. How did those voters get ballots sent to  
23 them if they didn't have driver's license numbers or  
24 Social Security numbers in the system?

25 A. That I don't know. You would have to talk

1 to the counties.

2 Q. With respect to the voter who lacked  
3 driver's license or Social Security number information  
4 in their voter registration files, what purpose do the  
5 mail ballots provisions of SB 1 serve?

6 MS. HUNKER: Objection, form.

7 BY THE WITNESS:

8 A. The same as they serve for any other  
9 person, which is to identify the voter.

10 BY MR. FREEMAN:

11 Q. Is it possible for SB 1 to serve that  
12 purpose if the voter doesn't have a driver's license  
13 number or Social Security number on file?

14 A. Sure.

15 Q. How would that happen?

16 A. They put one on file as part of the  
17 corrective action process.

18 Q. So absent the voter taking further action  
19 to supplement their registration file, can it serve any  
20 purpose?

21 A. Absolutely. It serves the purposes of  
22 making them supplement their voter registration file so  
23 we have a more complete file. That helps us with all  
24 kinds of matching on our list maintenance. It serves a  
25 purpose, absolutely.

1 Q. With respect to voters who do not currently  
2 have a driver's license number or Social Security  
3 number on file, is there any connection between those  
4 numbers and the voter's qualifications to vote in Texas  
5 elections?

6 MS. HUNKER: Objection, form.

7 BY THE WITNESS:

8 A. Well, I mean obviously to vote successfully  
9 they are going to have produce an ID when they vote in  
10 person, and they are going to have to do the same thing  
11 when they vote by mail.

12 BY MR. FREEMAN:

13 Q. Not produce an ID, but produce a number?

14 A. Produce an ID.

15 Q. When they vote by mail?

16 A. That's right, that's what the number is  
17 it's an ID number.

18 Q. Sorry. When you say ID I thought you meant  
19 like a copy of a card.

20 With respect to a voter who does not have a  
21 Social Security number or driver's license number on  
22 file, is there any connection between that number and  
23 establishing the voter's identity prior to any  
24 supplementation of their registration record?

25 A. I'm not sure I understand that question.

1 Q. Well, if they don't have a driver's license  
2 number or Social Security number on record, is there a  
3 connection between the voter providing that number and  
4 the voter establishing their identity?

5 A. Yes.

6 Q. Does the voter establish their identity  
7 when they submit a mail ballot request with their  
8 driver's license number if the driver's license number  
9 isn't on TEAM?

10 MS. HUNKER: Objection, form, asked and answered.

11 BY THE WITNESS:

12 A. I don't know what you are getting at. Yes.

13 BY MR. FREEMAN:

14 Q. So switching gears, and we don't need to  
15 take a break yet, that's good.

16 How long did you serve as director of the  
17 elections division in the Office of the Texas Secretary  
18 of State?

19 A. 11 years, two months, five days.

20 Q. Based on your experience would you agree --

21 A. Not that I was counting.

22 Q. Based on your experience, would you agree  
23 that a form provided to voters should be designed so  
24 that a voter who follows the instructions will have the  
25 form accepted?

1 MS. HUNKER: Objection, form.

2 BY THE WITNESS:

3 A. Yes, that's true. That's the goal of the  
4 form.

5 BY MR. FREEMAN:

6 Q. Since the May 2022 runoff, did the Office  
7 of the Secretary of State make any changes to the  
8 absentee ballot by mail application?

9 A. We changed several forms. I'm pretty sure  
10 the application if it's got an oath of assistance on it  
11 it changed, yes.

12 MR. FREEMAN: Mark this as Exhibit 2.  
13 (WHEREUPON, a certain document was  
14 marked Deposition Exhibit No. 2,  
15 for identification, as of 3/28/23.)

16 BY MR. FREEMAN:

17 Q. Mr. Ingram, is this the current absentee  
18 ballot by mail form? I will represent to you this  
19 form, I don't believe the date is on it, but it's the  
20 form that's currently on your website and it's dated  
21 December 9, 2021.

22 A. Yes. I mean it looks like it, yes.

23 Q. Okay. This form is still in effect, the  
24 form that's on the website?

25 A. It is.

1 Q. Any current plans to alter the form?

2 A. No.

3 Q. Has your office considered altering the  
4 form since it was issued?

5 A. No, not this form.

6 Q. Why not?

7 A. There is not a need to.

8 Q. Is there a statutory reason this form could  
9 not inform voters that they may provide both a Texas  
10 driver's license number and a partial Social Security  
11 number?

12 MS. HUNKER: Objection, form.

13 BY THE WITNESS:

14 A. It's not what the law says. The form  
15 outlines the law.

16 BY MR. FREEMAN:

17 Q. Okay. And so if the form outlines the law,  
18 is it not allowed for the form to inform voters that  
19 they may provide both numbers?

20 A. Not on the form. It's not the law.

21 Q. Understood.

22 Has your office suggested any kind of  
23 amendments to SB 1 that would permit including that  
24 information on this form?

25 A. No. There is plenty of outside channels



1 that emphasize that point.

2 Q. So is it not necessary to your mind?

3 A. Agree with that.

4 Q. This form does clarify that the Texas  
5 driver's license number is not your voter registration  
6 VUID number, correct?

7 A. Agree.

8 Q. Is that in the law --

9 MS. HUNKER: Objection, form.

10 BY MR. FREEMAN:

11 Q. -- that clarification?

12 A. Well, it's in the law is Texas election  
13 identification certificate number. People think that  
14 means their voter registration number.

15 Q. Why is it permissible to include this  
16 clarification and not the clarification that a voter  
17 may include both numbers if they wish?

18 A. Because if we did that you would be sitting  
19 there asking me questions about why we are requiring  
20 people to do something the law doesn't require. That  
21 would be a different lawsuit, but it would still be a  
22 lawsuit.

23 Q. Do other forms promulgated by your office  
24 include a red box around required information  
25 frequently omitted by voters?

1 A. The carrier envelope does.

2 Q. Is this a reason why this form doesn't have  
3 a red box around the SB 1 identification number  
4 requirements?

5 A. It's not needed.

6 Q. Why is it not needed?

7 A. Because the application can just be redone  
8 any time. It's a much less formal document. It's not  
9 the vote.

10 Q. Can it be redone if it's rejected -- strike  
11 that.

12 Can it be redone if the voter does not  
13 become aware of the rejection until after the ballot  
14 application deadline?

15 MS. HUNKER: Objection, form.

16 BY THE WITNESS:

17 A. It can't. But the voter can vote in person  
18 at that point. They have still complete ability to  
19 vote.

20 BY MR. FREEMAN:

21 Q. Just to confirm. During the 2022 general  
22 election, did your office continue to advise election  
23 administrators not to apply a hierarchy between DPS  
24 numbers and Social Security numbers when determining  
25 whether this form meets SB 1 requirements and identify

1 the correct voter?

2 A. I lost your thread there.

3 Q. Just confirming. During the 2022 general,  
4 did your office continue to tell local election  
5 administrators, county clerks they didn't need to apply  
6 a hierarchy between the DPS number and the SSN when  
7 they were determining whether an ABBM adequately  
8 identifies a voter for SB 1 purposes?

9 A. Absolutely.

10 Q. From an election administration  
11 perspective, during the 2022 general election did the  
12 language on this form directing voters to give their  
13 SSN for quote, if you do not have a Texas driver's  
14 license, Texas personal identification number or a  
15 Texas election identification certificate number, serve  
16 a purpose?

17 MS. HUNKER: Objection, form.

18 BY THE WITNESS:

19 A. It follows the law.

20 BY MR. FREEMAN:

21 Q. What is the purpose of the law in stating  
22 that --

23 MS. HUNKER: Objection, form.

24 BY MR. FREEMAN:

25 Q. -- to your knowledge?

1           A.           You would have to ask the legislature that  
2 question.

3           Q.           Fair enough.

4           MR. FREEMAN: We can mark this as Exhibit 3.

5                       (WHEREUPON, a certain document was  
6 marked Deposition Exhibit No. 3,  
7 for identification, as of 3/28/23.)

8 BY MR. FREEMAN:

9           Q.           Before we turn to Exhibit 3 can I ask one  
10 more question about the form marked as Exhibit 2.  
11 Regardless of what the legislature's intention is, are  
12 you able to identify a valid election administration  
13 purpose for including the language beginning, if you do  
14 not have a Texas driver's license on the ABBM form?

15           MS. HUNKER: Objection, form.

16 BY THE WITNESS:

17           A.           The election administration purpose is to  
18 accurately state the law on the form.

19 BY MR. FREEMAN:

20           Q.           Nothing else?

21           A.           That's it.

22           Q.           Mr. Ingram, what's the document that has  
23 been marked as Exhibit 3?

24           A.           It looks like an email.

25           Q.           If you go to the last page. Just take a

1 look at that real quickly. The email from Ms.  
2 Oehlschlager.

3 A. Okay.

4 Q. Am I correct that Ms. Oehlschlager wrote  
5 that because her mother followed the directions on the  
6 ABBM and nonetheless did not receive her mail ballot,  
7 this is an error in the application for a ballot by  
8 mail?

9 A. I'm not sure exactly what she is trying to  
10 say here. I don't understand the issue with it.

11 Q. Well, if I'm correct, Ms. Oehlschlager's  
12 mother submitted her driver's license number, and the  
13 county said she should have used the last four numbers  
14 of her Social Security rather than her driver's license  
15 number; is that your understanding of this email?

16 A. That I think is what she is trying to say,  
17 yes.

18 Q. Do you agree that because she followed the  
19 instructions on the form and provided her driver's  
20 license number rather than her Social, and did not  
21 receive a ballot, that the error is in the application?

22 MS. HUNKER: Objection, form.

23 BY MR. FREEMAN:

24 Q. The form itself?

25 A. No, I do not agree with that.

1 Q. Why not?

2 A. Because that's not the problem. The  
3 problem is she didn't put a number that was in her  
4 voter registration record.

5 Q. Did she provide the number that the form  
6 instructed her to provide?

7 A. I don't know. It could be that the number  
8 was wrong. I don't know what the problem is. I would  
9 have to talk to Hector County to find out why they  
10 rejected this.

11 Q. It at least appears from the email that  
12 they rejected it because she provided her driver's  
13 license number rather than her Social, correct?

14 A. That's what she says.

15 Q. If an ABBM is rejected rather than a mail  
16 ballot, that rejection is not included in the mail  
17 ballot rejection rate that you conveyed to the  
18 legislature, correct?

19 A. I agree with that.

20 Q. If Ms. Oehlschlager provided her driver's  
21 license number, and only her Social Security number was  
22 on file and her ABBM was rejected as a result, that's  
23 not her fault in terms of why the ABBM was rejected,  
24 correct?

25 MS. HUNKER: Objection, form.

1 BY THE WITNESS:

2 A. Well, I mean if she doesn't put a number  
3 that's in her voter registration record then she either  
4 needs to supplement her voter registration record or  
5 supply a different number.

6 BY MR. FREEMAN:

7 Q. Did she do anything wrong in completing the  
8 ABBM?

9 MS. HUNKER: Objection, form.

10 BY THE WITNESS:

11 A. She didn't identify herself with a number  
12 from her record.

13 BY MR. FREEMAN:

14 Q. Was there a way for her to know prior to  
15 submitting this form which number was in her record?

16 A. No. I mean she could call and ask or she  
17 could fix it after the fact.

18 Q. Do you instruct local officials to tell  
19 voters which number is on their file if they call and  
20 ask before submitting mail ballot materials?

21 A. That's something they can do, yes,  
22 absolutely.

23 MS. PERALES: Objection, non-responsive.

24 BY MR. FREEMAN:

25 Q. Do you instruct them it's something they

1 may do?

2 MS. HUNKER: Objection, form.

3 BY THE WITNESS:

4 A. We don't have to instruct them they can do  
5 that. They can answer voter questions. They answer  
6 voter questions all the time.

7 MS. PERALES: Objection, non-responsive.

8 BY MR. FREEMAN:

9 Q. Let's turn to another voter email. If we  
10 could mark this as Exhibit 4.

11 (WHEREUPON, a certain document was  
12 marked Deposition Exhibit No. 4,  
13 for identification, as of 3/28/23.)

14 BY MR. FREEMAN:

15 Q. Mr. Ingram, what's this document?

16 A. This looks like an email.

17 Q. If you go to the email or the original  
18 email Ms. Martin sent, can you describe the problem  
19 that Ms. Martin's daughter experienced in the 2022  
20 general election?

21 A. That she doesn't have both numbers on her  
22 file apparently.

23 Q. Did Ms. Martin's daughter submit her  
24 driver's license number, but only her Social Security  
25 number was on file?



1           A.           That's apparently what Comal County  
2 informed them.

3           Q.           Am I correct that this is the same problem  
4 that Ms. Oehlschlager experienced?

5           MS. HUNKER: Objection, form.  
6 BY THE WITNESS:

7           A.           I don't know that.  
8 BY MR. FREEMAN:

9           Q.           At least the same problem that Ms.  
10 Oehlschlager represented to your office that she  
11 experienced?

12          A.           It was her mother that experienced it, but  
13 yes.

14          Q.           Am I correct that Ms. Martin describes the  
15 ABBM form as very misleading?

16          A.           I don't know. I haven't gotten to that  
17 part yet.

18          Q.           In the first paragraph, couple sentences  
19 in, beginning with, "first of all," does she describe  
20 the application as very misleading?

21          MS. HUNKER: Objection, form.  
22 BY THE WITNESS:

23          A.           She says those words, yes.  
24 BY MR. FREEMAN:

25          Q.           And for the record do you agree?

1 A. No.

2 Q. Do you consider the rejection of Ms.  
3 Martin's daughter's ABBM to be her daughter's fault?

4 A. I don't know what your interest in  
5 assessing fault is. I'm not going to say it's  
6 anybody's fault.

7 Q. Is the ABMM designed to maximize the  
8 likelihood a voter who follows the instructions will  
9 have the form accepted?

10 A. I don't know. It follows the law.

11 Q. Going about an hour. Do you want to take a  
12 break for a minute or are you okay?

13 A. I'm fine.

14 Q. Since the May 2022 runoff -- we're changing  
15 gears. Did the Office of the Secretary of State make  
16 any changes to the mail ballot carrier envelope?

17 A. Yes.

18 MR. FREEMAN: We can mark this as Exhibit 5.

19 (WHEREUPON, a certain document was  
20 marked Deposition Exhibit No. 5,  
21 for identification, as of 3/28/23.)

22 BY MR. FREEMAN:

23 Q. Mr. Ingram, what's this document?

24 A. Well, it's an 8 1/2 x 11 copy of pieces of  
25 a carrier envelope.

1 Q. Is this the up-to-date version of the  
2 carrier envelope?

3 A. It looks like it.

4 Q. What changes were made during the general  
5 election period?

6 A. We put a red box around the numbers and we  
7 changed the oath of office.

8 Q. Did your staff consider any further changes  
9 to the mail ballot carrier envelope during the general  
10 election period?

11 A. We did not.

12 Q. Why not?

13 A. There wasn't a need.

14 Q. Did your office have any concerns about the  
15 red box being fully accessible to voters with any kinds  
16 of disabilities?

17 A. No.

18 Q. Is there an issue with the red type and  
19 voters with disabilities?

20 A. I understand that to be the case, yes.

21 Q. What's the issue?

22 A. There's some people with some kinds of  
23 visual impairments don't see it.

24 Q. Would it be helpful to Texas voters if the  
25 mail ballot carrier envelope itself informed voters

1 that they may provide both a Texas driver's number and  
2 Social Security number?

3 MS. HUNKER: Objection, form.

4 BY THE WITNESS:

5 A. That's not the law.

6 BY MR. FREEMAN:

7 Q. Would it be helpful if it did?

8 A. Doesn't matter if it's helpful or not.

9 MS. HUNKER: Objection.

10 BY THE WITNESS:

11 A. It's not the law. We can't suggest to  
12 voters that both numbers are required. We can suggest  
13 to voters that they go ahead and voluntarily use both  
14 numbers, and that they increase their chances of  
15 success if they do, and we can hound that message big,  
16 but we can't make any suggestion on the official form  
17 that both numbers are required.

18 BY MR. FREEMAN:

19 Q. Just so I understand it. Why can you not  
20 say it's optional on the form?

21 A. Because that's not the law.

22 Q. Okay. Are there any current plans to alter  
23 the carrier envelope?

24 A. If the law changes we will change the  
25 carrier envelope.

1 MR. FREEMAN: On to Exhibit 6.

2 (WHEREUPON, a certain document was  
3 marked Deposition Exhibit No. 6,  
4 for identification, as of 3/28/23.)

5 BY MR. FREEMAN:

6 Q. Mr. Ingram, what's this document?

7 A. This is the secrecy envelope that's put  
8 inside of the carrier envelope that contains the voter  
9 ballot. So copy of the front and back of it.

10 Q. Is this up to date?

11 A. Yes.

12 Q. What changes were made during the general  
13 election period to this document?

14 A. I don't know what specific changes were  
15 made. It looks like it was modified in July of '22,  
16 but I don't know what changed.

17 Q. Were the assistants instructions changed?

18 A. Well, it has to be, but the oath is not on  
19 here, so I don't know why we would change it.

20 Q. Any other changes you are able to identify?

21 A. Yes, it's No. 2 on the instruction to  
22 assistants that's what changed.

23 Q. Paragraph 2 under instructions states that,  
24 "A voter must provide one of the following numbers,"  
25 correct?

1 A. Yes.

2 Q. Paragraph two also includes the sentence  
3 "If a voter has not been issued one of these numbers, a  
4 voter must check the box --" strike that. I'm sorry.

5 Paragraph 2 also includes a sentence  
6 beginning, "If a voter has not been issued one of these  
7 numbers, voter may give the last four digits of his/her  
8 Social Security number; is that correct?

9 A. That's right.

10 Q. One of these numbers in that sentence  
11 refers to a Texas driver's license number; is that  
12 right?

13 A. Texas DL, Personal Identification Card,  
14 Election Identification Certificate.

15 Q. Thank you.

16 Do you agree this indicates to the voter  
17 that the voter may give the four digit Social Security  
18 number only if they lack a Texas driver's license  
19 number, ID Card or Election Identification Certificate?

20 MS. HUNKER: Objection, form.

21 BY THE WITNESS:

22 A. I agree that the instruction tracks the  
23 law.

24 MR. FREEMAN: I'm going to object as  
25 non-responsive.

1 BY MR. FREEMAN:

2 Q. My question was whether this indicates to  
3 the voter that the voter may give the partial Social  
4 only if they lack a DPS ID?

5 MS. HUNKER: Objection, from.

6 BY THE WITNESS:

7 A. That's what it says, but it follows the  
8 law. The form follows the law.

9 BY MR. FREEMAN:

10 Q. Got it.

11 Just again so I understand, I assume the  
12 answer is the same as the last form. But is there a  
13 statutory reason that the instructions here could not  
14 inform the voter they may provide both a Texas driver's  
15 license number, and partial Social?

16 A. That's not the law.

17 Q. Even if it's not the law that a voter may  
18 provide both, does that fact prevent you from adding  
19 language on instructions informing voters of their  
20 option to provide both?

21 A. I think I have told you before that forms  
22 are a road map to the law. They are not helpful hints.  
23 Helpful hints are something outside of the forms.  
24 Helpful hints we can do a voter education campaign. We  
25 don't put helpful hints on forms unless it's just

1 really really necessary, you know. I can think on the  
2 candidate application, you know, it's very important  
3 that candidate fill out every single blank on that  
4 application. There are a couple of blanks that are  
5 optional. We have made it very clear in the form that  
6 those blanks are optional because we have an obligation  
7 to track the law with regard to forms.

8 Q. Who decides what's really really necessary  
9 when it comes to including hints in a form?

10 A. Well, the hints track the law as well.  
11 That's my whole point. That the legislature has made  
12 that decision. Whenever they make a blank on a  
13 candidate application optional, then we need to put  
14 optional in parentheses next to that information so  
15 that the candidate knows the law says this is an  
16 optional blank even though everything on here is  
17 otherwise required. That's the legislature is the one  
18 that makes the law. The form tracks the law. If the  
19 legislature thinks we need to put a hint on there  
20 that's what we do.

21 Q. Could you put optional for voters who  
22 include a driver's license number next to the blank for  
23 the Social?

24 MS. HUNKER: Objection, form.

25 BY THE WITNESS:



1           A.       That's not what the law says. We have to  
2 track the law.

3 BY MR. FREEMAN:

4           Q.       Okay. Did your office consider any further  
5 changes to these instructions on Exhibit 6 during the  
6 general election period?

7           A.       No, just what was necessary because of the  
8 litigation.

9           Q.       Do you have any current plans to alter  
10 these instructions?

11          A.       We do not.

12          MR. FREEMAN: Mark this as Exhibit 7.

13                   (WHEREUPON, a certain document was  
14 marked Deposition Exhibit No. 7,  
15 for identification, as of 3/28/23.)

16 BY MR. FREEMAN:

17          Q.       Mr. Ingram, what's this document?

18          A.       It appears to be an email.

19          Q.       Is it from a Ms. Susan Johnson to the  
20 elections office?

21          A.       It is.

22          Q.       Did Ms. Johnson ask whether she would be  
23 penalized if she put more than one type of ID?

24          A.       That's the question.

25          Q.       Did your office direct her to the list of

1 early voting clerks rather than offering a substantive  
2 response?

3 A. We did.

4 Q. Why was that?

5 A. I don't know.

6 Q. Is that the standard procedure in your  
7 office when voters pose questions regarding how to  
8 successfully complete a form?

9 A. I would have thought we could answer this  
10 question. I don't know why we directed them to early  
11 voting clerk.

12 Q. Okay. Another form for you Exhibit 8.

13 (WHEREUPON, a certain document was  
14 marked Deposition Exhibit No. 8,  
15 for identification, as of 3/28/23.)

16 BY MR. FREEMAN:

17 Q. Mr. Ingram, what's this document?

18 A. This is the voter information voter  
19 instruction sheet.

20 Q. Does this go in --

21 A. That goes in a mail ballot packet.

22 Q. Thank you. Is this form up to date?

23 A. Yes.

24 Q. No changes were made during the election  
25 period?

1 A. I agree with that.

2 Q. Why not?

3 A. No need.

4 Q. We previously discussed some of the useful  
5 elements of county inserts. Does this instruction  
6 sheet share any of those useful elements?

7 MS. HUNKER: Objection, form.

8 BY THE WITNESS:

9 A. Well, I don't know what color a county  
10 prints it on, but as it looks here in Exhibit 8 it's  
11 black and white.

12 BY MR. FREEMAN:

13 Q. Is it small and designed to fall out of the  
14 packet?

15 A. No.

16 Q. Does it inform a voter that they have the  
17 option of including both a Texas driver's license  
18 number and a partial Social?

19 A. No.

20 Q. Why not?

21 A. Because it's not the law.

22 Q. This is not a form they fill out. It's an  
23 instruction sheet. I wanted to understand if the same  
24 set of rules apply.

25 A. The instructions are part of the form.

1 Q. Okay. Thank you.

2 MR. FREEMAN: We can mark this as Exhibit 9.

3 (WHEREUPON, a certain document was  
4 marked Deposition Exhibit No. 9,  
5 for identification, as of 3/28/23.)

6 BY MR. FREEMAN:

7 Q. What's this document?

8 A. It's an email exchange.

9 Q. If you could go to the third page, the  
10 final paragraph can you describe the problem Ms.  
11 Pfluger had in a 2022 election?

12 A. Yes.

13 Q. What's the problem that Ms. Pfluger had?

14 A. She says she was rejected because she  
15 didn't include the DL under the flap.

16 Q. Am I correct Ms. Pfluger compliments the  
17 instructions on the Secretary of State's website?

18 A. Yes.

19 Q. Does Ms. Pfluger raise concerns about the  
20 absence of similar instructions on the carrier  
21 envelope?

22 A. She said the voter should be reminded  
23 before the carrier envelope is sealed they need to  
24 provide this information.

25 Q. Go back to the third page. Did she say,

1 "Your website clearly indicates this change, and  
2 provides excellent instructions of what's required.  
3 I'm concerned that not enough voters will see this  
4 information before voting by mail."

5 Is that right?

6 A. That's what she says. We hear that form of  
7 argument a lot. I saw that, but I don't know if those  
8 other dummies will see it. We hear that argument a  
9 lot.

10 Q. Am I right that limitations in the law  
11 itself preclude your office from providing similar  
12 instructions that are on your website on the form  
13 itself?

14 MS. HUNKER: Objection, form.

15 BY THE WITNESS:

16 A. I agree the form is a road map to the law.

17 BY MR. FREEMAN:

18 Q. Your website provides additional  
19 information beyond what's in the law, correct?

20 MS. HUNKER: Objection, form.

21 BY THE WITNESS:

22 A. Sometimes.

23 BY MR. FREEMAN:

24 Q. Does it provide additional information with  
25 respect to how to comply with the mail ballot

1 provisions of SB 1?

2 A. We try to say things in a more English and  
3 flowing manner.

4 MR. FREEMAN: I think it's a good time to take a  
5 quick break.

6 (WHEREUPON, a recess was had.)

7 BY MR. FREEMAN:

8 Q. Mr. Ingram, since the May 2022 runoff, did  
9 The Office of the Secretary of State make any changes  
10 to the FPCA signature sheet?

11 A. Yes.

12 MR. FREEMAN: Mark this as Exhibit 10.

13 (WHEREUPON, a certain document was  
14 marked Deposition Exhibit No. 10,  
15 for identification, as of 3/28/23.)

16 BY MR. FREEMAN:

17 Q. Mr. Ingram, what's this document?

18 A. This is the signature sheet for voters from  
19 overseas or military who's domestic or oversees.

20 Q. Is this the up-to-date version of that  
21 form?

22 A. It is.

23 Q. What changes were made during the general  
24 election period?

25 A. The oath language was changed.

1 Q. That's all?

2 A. That's it.

3 Q. Did you or your staff consider any further  
4 changes to the FPCA signature sheet during the general  
5 election period?

6 A. We did not.

7 Q. Why not?

8 A. There was no need.

9 Q. Is there a statutory reason, just to  
10 confirm, that the FPCA signature sheet could not inform  
11 military overseas voters that they may provide both a  
12 Texas driver's license number and a four digit Social?

13 A. That's not required by the law.

14 Q. Just to close the loop, if it's not  
15 required by the law it can't be on this form, correct?

16 MS. HUNKER: Objection, form.

17 BY THE WITNESS:

18 A. The form is a map to the law.

19 BY MR. FREEMAN:

20 Q. Any current plans to alter the signature  
21 sheet?

22 A. No.

23 Q. Are you aware of how many FPCA voters had  
24 their ballot rejected during the 2022 general election  
25 because of SB 1 requirements related to numbers

1 associated with the voter registration record?

2 A. I don't know.

3 Q. Are you aware of how many active duty  
4 members of the military had their ballots rejected  
5 during the 2022 general because of SB 1 number  
6 requirements?

7 A. I don't know.

8 Q. Do you have any practical basis to believe  
9 that any rejected ballots submitted by FPCA voters were  
10 not returned by eligible Texas voters who were who they  
11 said they were?

12 MS. HUNKER: Objection, form.

13 BY THE WITNESS:

14 A. I'm sorry. I don't understand the  
15 question.

16 BY MR. FREEMAN:

17 Q. Do you have any reason to believe that any  
18 FPCA voters -- strike that.

19 Do you have any reason to believe that any  
20 FPCA ballots that were rejected due to SB 1 were  
21 submitted by individuals who were not eligible Texas  
22 voters?

23 MS. HUNKER: Objection, form.

24 BY THE WITNESS:

25 A. I don't know.



1 BY MR. FREEMAN:

2 Q. Do you have any future plans to address  
3 ballot rejections among active duty military  
4 specifically?

5 A. Not other than, you know, the what we are  
6 going to do with ballot boards, educate them on the  
7 early voting process and their opportunities there.

8 Q. My colleague intends to address training  
9 conducted by The Office of the Secretary of State  
10 during Rule 30(b)(6) deposition, but I have a few quick  
11 questions about updates to the training prior to the  
12 end of last year. So if we could mark this document as  
13 Exhibit 11 I promise we will only talk about a few  
14 pages.

15 (WHEREUPON, a certain document was  
16 marked Deposition Exhibit No. 11,  
17 for identification, as of 3/28/23.)

18 BY MR. FREEMAN:

19 Q. Mr. Ingram, what's this document?

20 A. It appears to be a presentation on ballot  
21 by mail.

22 Q. Is this the most recent presentation on  
23 ballot by mail that your office has provided?

24 A. I believe so. I mean what I find on those  
25 power points is the date that it's printed is the date

1 that shows up on here. So it's not really a very  
2 useful guide. But as far as I know, we didn't change  
3 our guidance or instructions in our presentations  
4 throughout the '22 year.

5 Q. It's from the election law seminar. Do you  
6 know when that was held?

7 A. I don't. It was in July or August.

8 Q. Okay. Did you participate in the drafting  
9 of this document?

10 A. I did review it, yes.

11 Q. So others drafted, but you reviewed after  
12 it had been drafted; would that be right?

13 A. That's correct.

14 Q. Did you give the training based on this  
15 document?

16 A. No, sir.

17 Q. Who did?

18 A. I don't remember, maybe Heidi Martinez.

19 Q. Who is Ms. Martinez?

20 A. She is one of our staff attorneys.

21 Q. Does this presentation -- are you aware of  
22 whether this presentation instructed local clerks to  
23 inform voters upon request whether they had a driver's  
24 license or SSN on file?

25 A. As I stated before, we don't have to tell

1       them to do that. That's something they do, they answer  
2       voter's questions.

3               Q.       Just to be clear, they -- you don't train  
4       them to do that, that's just something you expect them  
5       to do?

6               MS. HUNKER: Objection, form.

7       BY THE WITNESS:

8               A.       I expect county election officials to  
9       answer voter questions, yes, I do.

10      BY MR. FREEMAN:

11              Q.       Including that question?

12              A.       Yes, including that question very much so.

13              Q.       Turning to page 31. What are the matters  
14      set on page 31?

15              A.       The best practices when reviewing an  
16      application for ballot by mail.

17              Q.       So this is the review conducted by the  
18      early voting clerk?

19              A.       Early voting clerk is the one who reviews  
20      applications for ballot by mail, yes.

21              Q.       The early voting clerk has to look up the  
22      registration status of the voter as part of that  
23      process?

24              A.       That's correct.

25              Q.       And do you suggest as part of that training

1 how they should look up the voter registration status  
2 of an applicant?

3 A. No.

4 Q. Do you have an understanding of how they  
5 typically go about doing that?

6 A. They either use TEAM or they use their  
7 local system. And some off-line counties use TEAM for  
8 this.

9 Q. What information do they plug in when they  
10 are trying to pull up the registration status like  
11 name?

12 A. Well, I mean if you're using TEAM you can  
13 search by voter name. That's probably the way they do  
14 it. They are limited to their county.

15 Q. If we turn to page 32. What are the  
16 matters set out here?

17 A. This talks about the new law.

18 Q. This is talking about looking up  
19 identification numbers; is that correct?

20 A. That's correct.

21 Q. That is separate from looking up  
22 registration status?

23 A. It's part of the registration status.

24 Q. But it's --

25 A. That's what it says at the last sentence

1 you talk to the voter registrar to confirm the voter  
2 registration and status.

3 Q. But am I correct that the numbers provided  
4 here, driver's license, Social Security number, they  
5 are not used to look up the voter, they are used to  
6 confirm the voter; is that correct?

7 A. They are used to make sure the voter has  
8 properly identified themselves on the application, yes.

9 Q. Those numbers are not used to find the  
10 voter in TEAM as part of the ABBM processing, correct?

11 A. No, sir. I mean not usually. I guess they  
12 could look it up by DL number if they wanted to.

13 Q. Do you have any understanding as to  
14 whether -- strike that.

15 Do you instruct local officials to do that?

16 MS. HUNKER: Objection, form.

17 BY THE WITNESS:

18 A. We don't tell them how they use TEAM. All  
19 of the fields are available to look up anything they  
20 want to look up.

21 BY MR. FREEMAN:

22 Q. Are you aware of any local officials using  
23 the Texas driver's license number or Social Security  
24 number to look up a voter as part of the initial  
25 determination of their registration status?

1           A.       If that's the way they do it's the way we  
2 do. We don't know about it.

3           Q.       You don't know about it personally?

4           A.       That's right. Or as an office that's not  
5 something we get into.

6           Q.       Okay.

7           A.       We tell them how to do a voter search.

8           Q.       Turn to page 40. You look at pages 40, 41  
9 and 42. What are the matters set out on these pages in  
10 the presentation?

11          A.       They are talking about the new law, the  
12 requirement for a number on the carrier envelope.

13          Q.       Is there any information here about how the  
14 numbers are to be used in the mail voting process other  
15 than as a basis for rejection of a mail ballot?

16          A.       That's not what this says. I don't know  
17 why would you say -- what are you asking?

18          Q.       I'm asking if there is any information here  
19 about how the numbers are to be used in the mail voting  
20 process other than as a basis to confirm voter identity  
21 or reject the ballot?

22          MS. HUNKER: Objection, form.

23 BY THE WITNESS:

24          A.       They are supposed to look up the number  
25 provided by the voter to see if it's in the voter

1 registration record. I don't know.

2 BY MR. FREEMAN:

3 Q. Is there any information here about using  
4 the number to look up the voter in the first instance  
5 as opposed to using the record that has already been  
6 pulled up with other information to confirm that the  
7 Texas driver's license number and Social Security  
8 number line up?

9 A. Again, how they look up a voter is how they  
10 look up a voter. We don't get into that.

11 Q. I have to ask you a few questions about the  
12 ballot tracker. When we last met last year we  
13 discussed the log-in requirements of the mail ballot  
14 tracker. We talked a little bit about it here today as  
15 well. Have there been any changes thus far to the  
16 log-in requirements for the ballot tracker since we met  
17 in April of last year?

18 A. There have not.

19 Q. Does The Office of Secretary of State have  
20 the ability to change these log-in requirements absent  
21 changes to the election code?

22 A. We do not.

23 Q. Do you know if the ballot tracker log-in  
24 page provides information as to how to add information  
25 to a voter TEAM record if the voter doesn't have a TDL

1 and SSN on file?

2 A. I don't know. We were talking about  
3 putting a notice on there. I don't remember if it's  
4 there or not.

5 MR. FREEMAN: We can mark this as Exhibit 12.

6 (WHEREUPON, a certain document was  
7 marked Deposition Exhibit No. 12,  
8 for identification, as of 3/28/23.)

9 BY MR. FREEMAN:

10 Q. What's Exhibit 12?

11 A. It's appears to be a page from  
12 votetexas.gov.

13 Q. Does this inform voters how to use the  
14 ballot tracker?

15 A. That's what it's for, yes, sir.

16 Q. Does it inform them how to fill in missing  
17 information if they don't have both a TDL and SSN on  
18 their TEAM file?

19 A. I don't think we talk about it here, no.

20 Q. To your knowledge, it's not on the log-in  
21 page for the ballot tracker either, is it?

22 A. The My Voter portal I'm thinking has a link  
23 to texas.gov if you want to add numbers.

24 MR. FREEMAN: Given it's just for the purpose of  
25 refreshing, Kathleen, would you object to me using the



1 image of the My Voter portal on an electronic device  
2 without submitting it as an exhibit?

3 MS. HUNKER: I do not as you represent that you  
4 will submit a printout of that as an exhibit?

5 MR. FREEMAN: Happy to do that. Let's leave a  
6 hole for Exhibit 13. We will just use a copy of my  
7 voter portal.

8 MS. HUNKER: Though I would like the witness to  
9 confirm that the portal on the phone would be the same  
10 as if --

11 (WHEREUPON, a certain document was  
12 marked Deposition Exhibit No. 13,  
13 for identification, as of 3/28/23.)

14 BY THE WITNESS:

15 A. It's not. Over on the left-hand side --  
16 there we go. See that need to change your name or  
17 address, the link that's the link to texas.gov. The  
18 log on to texas.gov it adds both their numbers.

19 BY MR. FREEMAN:

20 Q. It asks need to change your name or  
21 address. Does it also ask or does it indicate anywhere  
22 that that same form can be used to add a driver's  
23 license number or a Social Security number?

24 A. When you get to that link it says, "If you  
25 are here to add your numbers, this is what you do."

1 Q. On the ballot tracker web page, however,  
2 does it indicate that the need to change your name or  
3 address page is also the means by which you can add a  
4 driver's license or Social Security number?

5 A. I don't think so.

6 MS. HUNKER: Just to clarify, we have somebody  
7 designated as 30(b)(6) to talk about voter education  
8 that includes the website from texas.gov.

9 MR. FREEMAN: This is a topic we discussed at his  
10 prior deposition so I'm just updating.

11 BY MR. FREEMAN:

12 Q. Currently does the off of -- prior to your  
13 no longer being elections director, had you developed  
14 any plans to provide additional information on the  
15 ballot tracker website to voters who attempt and fail  
16 to log in to the tracker as to how to add driver's  
17 license or Social Security number information to their  
18 TEAM record?

19 A. I don't know. We might.

20 Q. Well, in the past when you were the  
21 elections director, had you developed plans to do that?

22 A. We talk about all of those kind of things,  
23 yes.

24 Q. Why did you decide not to do that at least  
25 thus far?

1           A.           It just hasn't come up as a thing to do  
2 yet.

3           Q.           Are you aware of any public efforts during  
4 the 2022 general election period to communicate to  
5 voters who have an ABBM or carrier envelope rejected  
6 because of SB 1 the means by which they can add  
7 information to their TEAM record, any public voter ad  
8 campaigns on that specific subject?

9           MS. HUNKER: Objection, form.

10 BY THE WITNESS:

11           A.           I don't know. I don't know if that was  
12 specifically addressed in the campaign. You would have  
13 to talk about Sam about that. It's something our  
14 office has communicated to county election officials to  
15 communicate to voters.

16 BY MR. FREEMAN:

17           Q.           When did your office communicate that to  
18 county election officials?

19           A.           Any meeting we had with them in '22. Texas  
20 Association of Election Administrators meeting in  
21 January, the county clerks, whenever we met with them  
22 down in Galveston, our summer seminar. Any chance we  
23 had that's what we talked about how to tell voters to  
24 fix the issues.

25           Q.           When you say the issues, these are the

1 issues caused by SB 1 for voters who don't have  
2 complete information on their team file; is that right?

3 A. No. Any problem with their mail ballot, if  
4 they didn't sign it, if they didn't fill out a state of  
5 residence, any problem. There is lots of problems that  
6 would result in a rejection of a mail ballot or the  
7 application, and we told them how to fix the issues.

8 Q. That includes issues --

9 A. Subset --

10 Q. -- ruling from SB 1?

11 A. The subset identification requirements.  
12 They didn't successfully complete those.

13 MR. FREEMAN: We can mark this as Exhibit 14.

14 (WHEREUPON, a certain document was  
15 marked Deposition Exhibit No. 14,  
16 for identification, as of 3/28/23.)

17 BY MR. FREEMAN:

18 Q. What's this document?

19 A. It appears to be an email from Colleen  
20 Stadnik and a response.

21 Q. Did Ms. Stadnik send this email asking for  
22 help correcting the driver's license information on her  
23 ballot envelope?

24 A. She wants to know how to find the  
25 corrective action form.

1 Q. But she was told her ballot was -- that was  
2 missing a driver's license number; is that right?

3 A. That's right.

4 Q. What time did she send that email?

5 A. She sent it on November 10 apparently.

6 Q. When did your office respond?

7 A. November 14.

8 Q. At what time?

9 A. 5:54.

10 Q. When were corrections to ballots missing  
11 driver's license numbers due after the November 2022  
12 general election?

13 A. The sixth day.

14 Q. Was November 14 the sixth day?

15 A. I believe so.

16 Q. Were they due by 7:00 p.m.?

17 A. I don't know about 7:00 p.m. I thought we  
18 talked about until midnight.

19 Q. Is that only possible if a clerk's office  
20 is open until midnight?

21 A. No.

22 Q. How would they submit a corrective action  
23 form if the clerk's office is closed?

24 A. They don't have to do a corrective action  
25 form. They had to go to votetexas.gov and confirm

1 their numbers are correct on there. That produces a  
2 task on the dashboard of the county that this one has  
3 been corrected.

4 Q. Did your office inform this voter, "You  
5 must deliver the completed corrective action form in  
6 person to the early voting clerk's office by the end of  
7 business today"?

8 A. It says or.

9 Q. So the first information it does not say or  
10 would you agree then it subsequently says or?

11 MS. HUNKER: Objection, form.

12 BY THE WITNESS:

13 A. It says, "You make correct missing or  
14 incorrect personal ID numbers through the vote ballot  
15 tracker or by votetexas.gov or by delivering a  
16 corrective action form."

17 BY MR. FREEMAN:

18 Q. Right. But first it says, "The county  
19 should have sent you a notice with the corrective  
20 action form on the back. You must deliver the  
21 completed corrective action form in person to the early  
22 voting clerk's office by the end of business today,  
23 Monday, November 14, 2022," isn't that right?

24 A. Then it gives alternative.

25 Q. Yes. But with regards to the -- with

1 regards to specific information requested by the voter  
2 on how to submit a corrective action form, your office  
3 provided that information at 5:55 p.m., and instructed  
4 the voter to submit the form by close of business that  
5 same day; is that correct?

6 MS. HUNKER: Objection, form.

7 BY THE WITNESS:

8 A. I'm not going to agree with that  
9 characterization. That's not what it says. It says  
10 what it says.

11 BY MR. FREEMAN:

12 Q. Was that your office's typical practice in  
13 terms of their ability to respond to requests for  
14 assistance regarding ballot corrections?

15 MS. HUNKER: Objection, form.

16 BY MR. FREEMAN:

17 Q. To not be able to respond until the day  
18 that the corrective action forms were due?

19 MS. HUNKER: Same objection. Objection.

20 BY THE WITNESS:

21 A. The responses were made when they were  
22 made. You can go back and look at all of the emails if  
23 you want to.

24 BY MR. FREEMAN:

25 Q. Was there a volume of responses such that

1 it was difficult for your office to respond more  
2 quickly than by the day the corrective action forms  
3 were due?

4 A. Our response time is within 24 hours. This  
5 is an exception of that.

6 Q. When do those exceptions occur?

7 A. I don't know. When they occur that's what  
8 makes it an exception.

9 Q. I'm just trying to understand, you know, if  
10 you have a typical practice, but there are exceptions.  
11 Is there a set of circumstances when you typically view  
12 or experience those exceptions?

13 A. Our goal, our practice, our policy is to  
14 respond to email and phone calls within 24 hours.

15 Q. Okay. Do you know how many exceptions  
16 occurred in the November 2022 general?

17 A. I do not.

18 Q. Do you know if this voter was  
19 disenfranchised by SB 1?

20 MS. HUNKER: Objection, form.

21 BY THE WITNESS:

22 A. I have no idea.

23 BY MR. FREEMAN:

24 Q. We previously discussed a number of ways  
25 that a voter can update their TEAM record after the



1 close of registration so they may successfully submit  
2 an ABBM. Prior to the November 2022 general could a  
3 voter submit a new voter registration form after the  
4 close of registration?

5 A. Yes.

6 Q. Could they submit a copy of their driver's  
7 license and their ID card with the ABBM?

8 A. They could.

9 Q. Did they visit texas.gov to provide  
10 information already in DPS databases to TEAM?

11 A. That's correct.

12 Q. Was there anything else?

13 A. Those are the ways, I think.

14 Q. Is there any indication on the Texas voter  
15 registration form that was in use at the time that it  
16 can be used to add missing information to a voter  
17 registration record as opposed to changing an existing  
18 name or address?

19 A. No, there is not anything special about it.  
20 It could be used for that purpose.

21 Q. Is there any indication on the form itself  
22 that it can be used for that purpose?

23 A. There is a form -- form says it could be  
24 used to change your record, yes.

25 Q. Well, let's mark this --

1           A.       There is one of the boxes that says update  
2 existing record, isn't there? Isn't that one of the  
3 boxes on the form? I think so.

4           MR. FREEMAN: Let's use this as Exhibit 15.

5                   (WHEREUPON, a certain document was  
6 marked Deposition Exhibit No. 15,  
7 for identification, as of 3/28/23.)

8 BY MR. FREEMAN:

9           Q.       What's this document?

10          A.       It's a copy of voter registration  
11 application.

12          Q.       In box one this indicates it can be used as  
13 a new application to change address, name or other  
14 information or to request replacement card, correct?

15          A.       That's correct.

16          Q.       It does not indicate it can be used to add  
17 missing information; is that right?

18          MS. HUNKER: Objection, form.

19 BY THE WITNESS:

20          A.       What do you think change other information  
21 means?

22 BY MR. FREEMAN:

23          Q.       I would -- well, when you see --

24          MR. FREEMAN: You know what, I'm going to object  
25 to that as non-responsive and ask again.

1 BY MR. FREEMAN:

2 Q. It does not indicate that you can add  
3 missing information on this form, correct?

4 MS. HUNKER: Objection, form.

5 BY THE WITNESS:

6 A. I disagree. It says you can change other  
7 information, and that includes updating.

8 BY MR. FREEMAN:

9 Q. If a voter submits a voter registration  
10 application to add missing information to a voter  
11 registration record, would your office or the local  
12 registrars run a live check on the driver's license  
13 number or Social Security number?

14 A. Probably.

15 Q. Do you know for certain?

16 A. I don't. But it wouldn't be our office. I  
17 mean our office is the one that does it, but the county  
18 would do the live check.

19 Q. Is there anything other than the live check  
20 which may or may not occur that is used to verify the  
21 authenticity of the driver's license number or Social  
22 Security number being submitted?

23 A. No.

24 Q. So if a voter submits a voter registration  
25 application that provides the same information as the

1 ABBM and a driver's license number or Social Security  
2 number signed and submitted, correct, is there any  
3 differential in the information on this voter  
4 registration application from the information being  
5 submitted on the ABBM?

6 A. Yes, there is quite a lot of difference.

7 Q. What's the difference?

8 A. On ABBM you have your name, address, and  
9 date of birth. Here you have got a lot more than that.

10 Q. Name, address, date of birth, Texas  
11 driver's license number or Social, what else is present  
12 here?

13 A. "Are you a U.S. citizen? Will you be 18 or  
14 of age on or before election day? I understand that  
15 giving false information to procure a voter  
16 registration is perjury and a crime under State and  
17 Federal law. Conviction of this crime may result in  
18 imprisonment up to one year in jail, a fine of 4,000.  
19 Please read actual three statements to affirm before  
20 signing. I'm a resident of the county, and a U.S.  
21 citizen. I have not been finally convicted of a felony  
22 or if a felon I have concluded all of my punishment  
23 including any term of incarceration, parole,  
24 supervision, a period of probation or I have been  
25 pardoned, and I have not been determined by a final

1 judgment of a court exercising probate jurisdiction to  
2 be totally mentally incapacitated or partially mentally  
3 incapacitated without the right to vote."

4 Q. But a voter who has previously registered  
5 has already provided all of that information, correct?

6 A. Yes.

7 Q. So if a voter has to submit this voter  
8 registration application and then submit to ABBM, they  
9 are providing the same information they provided before  
10 plus the driver's license number so that they can  
11 provide the same information that they have provided  
12 before plus a driver's license number on an ABBM; is  
13 that right?

14 MS. HUNKER: Objection, form.

15 BY THE WITNESS:

16 A. The difference is they are signing under a  
17 statement that says affirming on penalty of perjury the  
18 accuracy of the information in this voter registration  
19 document.

20 BY MR. FREEMAN:

21 Q. If you go back to ABBM here, they are also  
22 filing under penalty of criminal law that the  
23 information on the APBM is accurate, correct?

24 A. I understand giving false information on  
25 this application is a crime.

1 Q. Okay.

2 A. Then the voter registration application, "I  
3 understand that giving false information to procure  
4 voter registration is perjury and a crime under State  
5 and Federal law. Conviction of this crime may result  
6 in imprisonment up to one year in jail, a fine of 4,000  
7 or both. Please read all three statements to affirm  
8 before signing. I'm a resident, I've not been finally  
9 convicted, I'm not mentally incapacitated."

10 Q. More details?

11 A. That's different.

12 Q. I understand it's different. But it's a  
13 crime to submit false on information on an ABBM,  
14 correct?

15 A. Agreed. It's a crime to put false  
16 information on any government document.

17 Q. To be clear, when a voter submits -- a  
18 registered voter submits a new voter registration  
19 application for purpose of adding a driver's license  
20 number and a Social Security number, they are  
21 submitting the same name, address information, date of  
22 birth, and signature on the voter registration  
23 application that they do on the ABBM with slightly  
24 different language concerning crime, and concerning  
25 qualifications, correct?

1 MS. HUNKER: Objection, form.

2 BY THE WITNESS:

3 A. No. I will reject that characterization.  
4 Slightly different. It's not slightly different. It's  
5 much more explicit.

6 BY MR. FREEMAN:

7 Q. With additional, more explicit information  
8 on the voter registration?

9 A. You can characterize it in that way.  
10 That's the only way I would say. It's a different  
11 form, different affirmant of perjury.

12 Q. In order to add the driver's license number  
13 or Social Security number information using a Texas  
14 voter registration application, a voter is submitting  
15 the same name, address, date of birth, and driver's  
16 license or Social Security number information that's on  
17 the ABBM as well; is that correct?

18 MS. HUNKER: Objection, form, asked and answered.

19 BY MR. FREEMAN:

20 Q. You may answer.

21 A. I'm not going to answer that again.

22 Q. You may answer.

23 A. I'm not going to answer it again.

24 Q. Sir?

25 A. You are going to tell me what I'm going to

1 do?

2 Q. You are under oath and required to answer  
3 questions in a deposition, sir.

4 A. I have --

5 MS. HUNKER: He's answered this question multiple  
6 times in different ways.

7 BY THE WITNESS:

8 A. I haven't answered it the way you like it,  
9 but I have answered it.

10 BY MR. FREEMAN:

11 Q. I'm trying to cut out the part of the  
12 question that you don't like so that we can get a clean  
13 record. So I would appreciate if you would answer my  
14 question.

15 A. Cutting out something that makes it a  
16 different answer is not going to be acceptable to me.  
17 My answer comes in all of the context.

18 Q. The voter registration application asks a  
19 voter for last name and first name, correct?

20 A. The voter registration application asks for  
21 what it asks for. It asks for a lot more than that.

22 Q. One of the things that the voter  
23 registration application asks for is voter last name  
24 and first name, correct?

25 A. You can read the form for yourself. That's



1 what it says.

2 Q. We are in a deposition, sir.

3 A. So.

4 Q. I ask questions.

5 A. I hear you.

6 Q. You answer them.

7 A. I am answering.

8 Q. That was not the answer to my question.

9 A. It was.

10 Q. Does the voter registration application ask  
11 for a voter's last name and first name?

12 A. The voter registration application asks for  
13 a voter's last name and first name and a lot of other  
14 information.

15 Q. Thank you. Does the voter registration  
16 application ask for a voter's residence address?

17 A. The voter registration application asks for  
18 what it asks for. One of those things is a residence  
19 address, but there is a lot of other things it asks for  
20 as well.

21 Q. Does the voter registration application ask  
22 for the voter's date of birth?

23 A. The voter registration application asks for  
24 the date of birth along with a lot of other  
25 information.

1 Q. Does the ABBM ask for the voter's last  
2 name, first name, residence address, date of birth, and  
3 other information as well?

4 A. The voter registration or the voter  
5 application for ballot by mail asks for what it asks  
6 for. It asks for those things plus some other stuff,  
7 yes.

8 Q. Do both documents ask for a driver's  
9 license or a driver's license number or Social Security  
10 number?

11 A. Both of them are required to put the ID  
12 number on there, one or the other. They are not the  
13 same document. They are not the same application.  
14 They have different purposes, and they have different  
15 statements with regard to perjury.

16 Q. Both documents required must be signed  
17 under penalty of -- must be signed with certification  
18 as to accuracy under penalty of criminal prosecution?

19 A. Both of them have different statements  
20 about what the penalty is with regard to signing false  
21 information.

22 Q. But they are both signed under penalty of  
23 some criminal prosecution for providing false  
24 information; is that correct?

25 A. They are both signed with whatever their

1 statement is on the particular document.

2 Q. But if a voter does not have driver's  
3 license information and Social Security number  
4 information on their voter registration record, one of  
5 the ways they can fix that is by first submitting the  
6 voter registration application, and then submitting  
7 ABBM with the exact same information on it plus a  
8 signature under somewhat different language; is that  
9 correct?

10 MS. HUNKER: Objection, form.

11 BY THE WITNESS:

12 A. Definitely not going to agree with that,  
13 sir.

14 BY MR. FREEMAN:

15 Q. Why?

16 A. Because voter registration has a different  
17 purpose. Number two, it doesn't have to be done  
18 before, it can be done afterward.

19 Q. Then the voter would have to submit a new  
20 ABBM; is that correct?

21 A. That's not correct.

22 Q. But they would have to do both; is that  
23 correct?

24 MS. HUNKER: Objection, form.

25 BY THE WITNESS:

1           A.       They have to have a number on the  
2 application for ballot by mail that's in their voter  
3 registration record.

4 BY MR. FREEMAN:

5           Q.       One of the ways they can add that is by  
6 submitting a form, a Texas voter registration form,  
7 correct?

8           A.       That's what we have discussed way early on.

9           Q.       Right.

10          MS. HUNKER: Dan, can we take a quick five-minute  
11 break?

12          MR. FREEMAN: Sure.

13                   (WHEREUPON, a recess was had.)

14 BY MR. FREEMAN:

15          Q.       Mr. Ingram, was there any publicly  
16 available information in the general election period  
17 indicating that a voter could submit a copy of their  
18 driver's license or ID card with their ABBM to address  
19 the SB 1 ID number requirement?

20          A.       Not that I know of. You would have to ask  
21 Sam to make for sure, but I don't think that was part  
22 of our campaign.

23          Q.       Do you know if there was any indication on  
24 Texas.gov during this period that the website could be  
25 used to update voter registration information other

1 than name and address?

2 A. I don't think so. I mean by website are  
3 you talking about Texas.gov?

4 Q. Yes.

5 A. Okay.

6 MR. FREEMAN: We can mark this as Exhibit 16.

7 (WHEREUPON, a certain document was  
8 marked Deposition Exhibit No. 16,  
9 for identification, as of 3/28/23.)

10 BY MR. FREEMAN:

11 Q. Mr. Ingram, what's this document?

12 A. This is a notice of rejected application  
13 for ballot by mail for missing or incorrect personal ID  
14 number.

15 Q. Was this the version of the form that was  
16 in use in the November general election?

17 A. I believe so, yes.

18 Q. I apologize. I had intended to provide you  
19 with form 6-4, which is a different notice of rejected  
20 application for ballot by mail. If we hold Exhibit 17  
21 for that, and I will show that to you on this laptop.

22 (WHEREUPON, a certain document was  
23 marked Deposition Exhibit No. 17,  
24 for identification, as of 3/28/23.)

25 BY MR. FREEMAN:

1 Q. What's form 6-4?

2 A. It's a notice of rejected application of  
3 ballot by the mail that says required ID number is not  
4 in your record.

5 Q. So that's a different notice of rejection  
6 application for ballot by mail from form 6-3. Is it  
7 specific for folks who don't have anything on their  
8 TEAM record; is that right?

9 A. Well, whatever they put on their  
10 application for ballot by mail is not in their record.

11 Q. Okay. So it's not just folks who have  
12 nothing, it's also for folks who put something and it  
13 didn't match; is that right?

14 A. It didn't -- if it didn't match because  
15 it's incorrect, they get the other form. If it didn't  
16 match because there is nothing there, they get this  
17 form.

18 Q. Okay. Great. Was this form in use in  
19 November 2022?

20 A. It was.

21 Q. Does it state there are only two ways to  
22 add the required numbers?

23 A. That's correct.

24 Q. Do you have any intention to update this  
25 form to tell voters they can mail in a copy -- strike

1 that.

2 Did you ever discuss with your colleagues  
3 updating this form to inform voters that they can mail  
4 in a copy of their Texas driver's license with their  
5 ABBM to update?

6 A. No. We got that question as a county who  
7 received a copy of DL and what do we do with this, so  
8 we answered that question. It was never going to be us  
9 telling a voter that they have to mail in a copy of  
10 their DL.

11 Q. The form only directs voters to go to  
12 Texas.gov generally, not to a specific page on that  
13 website; is that correct?

14 MS. HUNKER: Objection, form.

15 BY THE WITNESS:

16 A. It says you can update your voter  
17 registration record at Texas.gov.

18 BY MR. FREEMAN:

19 Q. Not like  
20 Texas.gov/updateyourvoterregistrationrecord?

21 A. Well, during the election season, Texas had  
22 change your name and address on your voter registration  
23 on front and center on the front page on Texas.gov.

24 MR. FREEMAN: If we could mark this as Exhibit  
25 18.

1 (WHEREUPON, a certain document was  
2 marked Deposition Exhibit No. 18,  
3 for identification, as of 3/28/23.)

4 BY MR. FREEMAN:

5 Q. Before we do will -- to your knowledge,  
6 will Texas.gov continue to have the update your name  
7 and address information on the home page during every  
8 election season moving forward?

9 MS. HUNKER: Objection, form.

10 BY THE WITNESS:

11 A. So we coordinate with DIR, Department of  
12 Information Resources, they are the ones who run the  
13 Texas.gov page, and we coordinate with them about when  
14 we would like that message to be prominent.

15 BY MR. FREEMAN:

16 Q. What's document Exhibit 18?

17 A. Well, it's a page that's on Texas.gov.

18 Q. Is this the page on which voters can update  
19 their name and address?

20 A. Yes.

21 Q. Is this -- do you know if this is a current  
22 page that's in use?

23 A. I don't know. I mean if it is there is  
24 different information one more page in.

25 Q. Well, I think I have that page as well.



1 But on this page is there any indication that this  
2 website can be used to update Texas driver's license  
3 number or Social Security number information on a voter  
4 registration record?

5 MS. HUNKER: Objection, form.

6 BY THE WITNESS:

7 A. There is not any indication of that on this  
8 page, no.

9 MR. FREEMAN: Mark this as Exhibit No. 19.

10 (WHEREUPON, a certain document was  
11 marked Deposition Exhibit No. 19,  
12 for identification, as of 3/28/23.)

13 BY MR. FREEMAN:

14 Q. What's Exhibit 19?

15 A. This is the identity management page for  
16 the Texas.gov.

17 Q. Is this the other page that you were  
18 thinking of?

19 A. No.

20 Q. Do you know if this is the current page  
21 that's in use on Texas.gov?

22 A. For identity management, yes.

23 Q. This is the page that's used to update a  
24 voter's name and address, correct?

25 A. This is for voter registration changes

1 through Texas.gov.

2 Q. Is this the page that voters would use to  
3 update their Texas driver's license number or Social  
4 Security number on their voter file?

5 A. If they wanted to add to voter file this  
6 was the one that replaces zero, no value with a number.

7 Q. Is there any indication on this website  
8 that this is the page that can be used to update Texas  
9 driver's license number or Social Security number on  
10 voter registration record?

11 A. No. But if you fill this out, the next  
12 page in says, "If your purpose is to update your voter  
13 record with your numbers you have done it so log out.  
14 You are finished."

15 Q. Okay. In some are there any instructions  
16 prior --

17 A. Act of logging in supplies no values.

18 Q. Understood. In some are there any  
19 instructions on Texas.gov prior to logging in that this  
20 site may be used to add a Texas driver's license number  
21 or Social Security number to voter registration  
22 records?

23 A. I don't think so.

24 Q. We previously discussed a number of ways  
25 voters can add or correct identification numbers on a

1 ballot envelope or FCPA signature sheet. Is there any  
2 change in those procedures since May of 2022?

3 A. There is not.

4 Q. So I'm clear, a voter can correct on the  
5 envelope or signature sheet and send it back, they can  
6 hand return the envelope or they can cancel the mail  
7 ballot and vote in person; is that right?

8 A. Those are some of the options.

9 Q. What are the other options?

10 A. They can correct the ballot tracker and add  
11 numbers to Texas.gov.

12 Q. But if a mail ballot has been sent back to  
13 them, they have to physically return the ballot; is  
14 that right?

15 A. They have to physically return a ballot,  
16 yes.

17 Q. They can only correct on the ballot tracker  
18 if the early voting ballot board has retained the  
19 ballot; is that right?

20 MS. HUNKER: Objection, form.

21 BY THE WITNESS:

22 A. Well, if they've got the ballot they've got  
23 to get it back, but they can also correct the  
24 information on the ballot tracker. Those are not  
25 mutually exclusive.

1 BY MR. FREEMAN:

2 Q. The ballot tracker is only accessible to  
3 voters who have both a Texas driver's license number  
4 and a Social Security number on their TEAM file,  
5 correct?

6 A. Right.

7 Q. As of right now?

8 A. That's correct. Which is over 96 percent  
9 of voters.

10 Q. Mr. Ingram, do you recall when we met back  
11 in April of 2022 that we discussed whether a single  
12 voter could be issued more than one DPS number?

13 A. Yes.

14 Q. Do you recall whether you knew at the time  
15 whether DPS had in fact issued multiple numbers to  
16 particular individuals over the course of their  
17 lifetime?

18 A. If I didn't say that's a DPS question I am  
19 saying it now, it's a DPS question.

20 Q. Do you know whether DPS has done that in  
21 the past?

22 A. To my knowledge, you get one number.

23 Q. I have some document I'm hoping can clear  
24 this up. We can mark this as Exhibit 19.

25 (WHEREUPON, a certain document was

1 marked Deposition Exhibit No. 20,  
2 for identification, as of 3/28/23.)

3 MR. FREEMAN: This is 20.

4 BY MR. FREEMAN:

5 Q. What's this document?

6 A. It appears to be an email exchange with  
7 Mr. or Mrs. Mickey Marvins and our office.

8 Q. If you go to the original email on page 3  
9 what's the problem that Ms. Marvins describes.

10 A. That she got an ID to replace her driver's  
11 license, and the ID number wasn't in her voter record.

12 Q. As a result, her friend who had this  
13 experience had a problem getting an absentee ballot  
14 because the number on her DPS identification was  
15 different when she went from a driver's license to an  
16 ID card; is that right?

17 A. Agree with that. Just in case you are  
18 wondering, that's not inconsistent with what I said.  
19 You get one number. You surrender your DL and you get  
20 the ID number. I don't want you under the impression  
21 you got two numbers. You got one number. It just  
22 changed.

23 Q. I see. Okay. Bit of a clarification.

24 A. I want to make sure we are clear.

25 Q. Over the course of a lifetime, is what I

1 asked before, a voter can be issued more than one ID  
2 number by DPS; is that correct?

3 A. If you change from one form of ID to  
4 another then yes.

5 Q. When did you first become aware of that  
6 fact?

7 A. I have always known that. I don't know --  
8 it's not a strange or unusual piece of information. I  
9 went to Arkansas, I had to surrender my driver's  
10 license. I came back, I had to surrender my Arkansas  
11 license.

12 Q. Am I correct that SB 1 permits voters to  
13 submit a driver's license number that is expired,  
14 correct?

15 A. That's correct.

16 Q. Even if I have surrendered my driver's  
17 license number, if that's the number -- if I have  
18 surrendered my driver's license and gotten an ID, if my  
19 driver's license is still on file with TEAM, I can vote  
20 using the number on my driver's license; is that right?

21 A. You can for up to four years for a person  
22 under 70. Then for a person over 70 it can be expired  
23 for however long you need it.

24 Q. Are you sure that's the rule for SB 1 and  
25 not for the voter ID?

1           A.           It's the same. It incorporates 63101 into  
2 mail ballots.

3           Q.           In any case, has your office taken any  
4 actions to address issues created by voters who have  
5 and hold DPS ID number on file and who have received a  
6 new DPS ID number on a new form of ID?

7           A.           That's voter responsibility to update their  
8 information in TEAM. And they can do that very  
9 conveniently, they are at DPS, say, "Use this  
10 information to update my voter record." They just have  
11 to check yes on a box.

12           MR. FREEMAN: Off the record for a moment.

13                               (WHEREUPON, a discussion was had  
14                               off the record.)

15 BY MR. FREEMAN:

16           Q.           Has your office done anything to address  
17 the issue of voters who submit the number of old  
18 identification that's no longer the number on TEAM, but  
19 remains valid for SB 1 purposes?

20           A.           I don't know what that question means.

21           Q.           Sure. Let's say a voter had a driver's  
22 license, surrenders it, gets an ID card and does update  
23 TEAM with the ID card number -- thumbs up from the  
24 witness -- but then they submit their old driver's  
25 license number because they are concerned or

1     misunderstand and think that's what they have to  
2     submit. Has your office done anything to address that  
3     specific scenario?

4             A.        You would have to talk to Sam about our  
5     education campaign. But, you know, what we tell voters  
6     if they call our office is that they need to use  
7     whatever is currently in their voter registration, and  
8     that's why we encourage them to use both numbers so  
9     that if one of them hits they are good.

10            Q.       Is a voter able, to your knowledge, to call  
11     their local clerk or election administrator and ask  
12     specifically what number is on their registration  
13     record?

14            A.       Of course.

15            Q.       So I could call and say what's the driver's  
16     license on my registration record and then fill that in  
17     on an ABBM?

18            A.       Sure.

19            MS. HUNKER: Objection, form.

20     BY THE WITNESS:

21            A.       It would go through some questions to  
22     validate that it's you and not some vote harvester  
23     trying to steal your vote, but yes.

24     BY MR. FREEMAN:

25            Q.       What questions would they use?



1           A.       I don't know. Whatever the county uses  
2 whenever they validate someone's identity on the phone.

3           Q.       Any information that isn't also on the  
4 ABBM?

5           A.       Well, it's information that would be in  
6 their voter record.

7           Q.       But it's information that was on the  
8 application prior to SB 1, right, name, date of birth,  
9 address, things like that, correct?

10          A.       That's correct.

11          Q.       In theory if a voter -- strike that.

12                   So if an individual wanted to cast an ABBM  
13 in someone else's name, the only security addition  
14 created by SB 1 is the driver's license number or a  
15 Social Security number, correct?

16          MS. HUNKER: Objection, form.

17 BY THE WITNESS:

18          A.       Well, I mean signature still counts.

19 BY MR. FREEMAN:

20          Q.       Sure. That was pre -- signature counted  
21 pre-SB 1, right?

22          A.       Agreed.

23          Q.       In fact, it's easier to meet the signature  
24 requirement after SB 1?

25          A.       Agreed.

1 Q. All the voter needs to do to get that  
2 driver's license number is to call the clerk with  
3 pre-SB 1 information and ask for which driver's license  
4 number is on file, no?

5 MS. HUNKER: Objection, form.

6 BY THE WITNESS:

7 A. No.

8 BY MR. FREEMAN:

9 Q. Why not?

10 A. Because they can call and ask, "What do I  
11 have on file?" They will say DL or SSN or both.

12 Q. What if they say what number is on file?

13 A. If the voter -- then I would imagine, I  
14 don't know because I'm not a county, but if I was a  
15 county voter registrar I would say, "What driver's  
16 license number -- what's your driver's license number?"  
17 They would look and say, "Yup that's what you got."

18 Q. Okay. Thank you for that clarification.

19 How many DPS ID numbers can be associated  
20 with a voter's TEAM record?

21 A. One.

22 Q. Has there been any discussion, to your  
23 knowledge, of adding a field to TEAM so that additional  
24 driver's license numbers could be listed?

25 A. That's something that we have recently

1 discussed to think about the next iteration of TEAM,  
2 and whether or not they want to have another field for  
3 an ID number. That decision has not been made yet.

4 Q. What's the stage of the procurement process  
5 for the next iteration of TEAM at this point?

6 A. We are going through the drafting of the  
7 RFP, RFO, whatever we are calling it.

8 Q. Do you know when that will be complete?

9 A. Soon. If I had my way it would have been  
10 two weeks ago.

11 Q. To be clear, if a voter has been issued  
12 multiple DPS numbers and provides a DPS ID number  
13 different from the one listed in TEAM on an ABBM and  
14 does not also provide a Social Security number, that  
15 ABBM will be rejected, correct?

16 A. If they don't provide a number that's in  
17 their voter registration record they will be rejected,  
18 yes, at least temporarily.

19 Q. Same thing on mail ballot?

20 A. Same thing on mail ballot.

21 Q. Would you agree a duly registered voter  
22 whose ballot was rejected under these circumstances was  
23 not at fault?

24 MS. HUNKER: Objection, form.

25 BY THE WITNESS:

1           A.           I'm not going to get into assignment of  
2           fault.

3           BY MR. FREEMAN:

4           Q.           Do you know if the fact that DPS has issued  
5           multiple ID numbers to the same individuals over their  
6           lifetimes has led to the rejection of mail ballot  
7           materials under SB 1?

8           MS. HUNKER:   Objection, form.

9           BY THE WITNESS:

10          A.           It's my understanding that's happened at  
11          least in Bexar County because I have a member of the  
12          ballot board who has been coming up here for the  
13          election meetings because of it.

14          BY MR. FREEMAN:

15          Q.           Have you conducted any further inquiry into  
16          the extent to which such voters have had their mail  
17          ballot materials rejected?

18          A.           Just what she says.

19          Q.           Is there anything else that could have been  
20          done for voters who have multiple DPS ID numbers to  
21          ensure their ballots are counted?

22          A.           I don't know how to answer that question.

23          Q.           I don't run an elections office. I'm  
24          asking if you know of anything else that could have  
25          been done by your office to help those voters?

1 A. I don't know how to answer that question.

2 Q. Okay. Is there anything else that the  
3 voter could have done if they have an old number on  
4 TEAM and submit number on their new ID card or vice  
5 versa?

6 A. Well, the voter has the responsibility to  
7 make sure their information in the voter registration  
8 record is correct and accurate and updated. The voter  
9 bears that responsibility.

10 Q. Do you know how many registered voters in  
11 Texas have been issued multiple numbers in their  
12 lifetimes?

13 A. I do not.

14 Q. Do you know how many ABBM or mail ballots  
15 have been rejected on account of the voters submitting  
16 a correct DPS ID number that was not listed on TEAM?

17 A. I don't.

18 Q. Have there been any actions taken by your  
19 office other than in-filling driver's license numbers  
20 as part of the HB2515 process to address the absence of  
21 driver's license numbers or up-to-date driver's license  
22 numbers on voter registration records?

23 A. We have made sure we have got a pipeline  
24 from Texas.gov so that we can capture that log-in  
25 information whenever someone logs in to fill in the

1 values for us.

2 Q. Anything else?

3 A. That's not an unsubstantial thing.

4 Q. Understood. Is there anything else so I  
5 have your full testimony?

6 A. I mean we have told the voters they need to  
7 use both. We told voters the way they can add numbers  
8 if they want to add numbers.

9 Q. Anything else?

10 A. That's it, I think.

11 MS. HUNKER: I know we took a short break before,  
12 but sort of a good place to take five if that's all  
13 right?

14 MS. HUNKER: Yes.

15 (WHEREUPON, a recess was had.)

16 MR. FREEMAN: Back on the record.

17 BY MR. FREEMAN:

18 Q. Mr. Ingram, to the extent you know, what  
19 was the final mail ballot rejection rate in the 2022  
20 primarily?

21 A. You know, it's obviously two different  
22 primaries, and there were different -- democrats were  
23 higher than the republicans, but I believe the  
24 composite rate was under 13 percent, under 12.8, 12.7,  
25 something like that.

1 Q. Do you know what the rate in the democratic  
2 primary was?

3 A. No. I think it was a little over 13 maybe.

4 Q. It's not a quiz. It's all right.

5 A. We can look it up.

6 Q. So the republican rate was a little bit  
7 lower than that?

8 A. It was a little under 12.

9 Q. In the primary runoff, do you know what the  
10 aggregate rate was?

11 A. Right at 12 percent.

12 Q. The democratic runoff, do you know what the  
13 rate was then?

14 A. I don't.

15 Q. Was the democratic rate higher than the  
16 republican rate in the primary runoff as well?

17 A. I think in the runoff it went the other  
18 way. I just have to go look and make sure, but it was  
19 close.

20 Q. Then we already discussed, but just so we  
21 have it here, what was the final rejection rate in the  
22 2022 general election?

23 A. 2.7 percent.

24 Q. Based on your knowledge and experience, how  
25 do these figures compare, 2.7 for 13 or so to the rate

1 of mail ballot impersonation in Texas elections before  
2 passage of SB 1?

3 MS. HUNKER: Objection, form.

4 BY THE WITNESS:

5 A. I have no idea what the rate of mail ballot  
6 impersonation is or ever has been.

7 BY MR. FREEMAN:

8 Q. After serving for over a decade as the  
9 director of elections for the State of Texas, do you  
10 know whether or not 2.7 percent of mail ballots cast in  
11 elections pre-SB 1 were actually cast by individuals  
12 other than the registered voter on whose behalf the  
13 ballots were cast?

14 MS. HUNKER: Objection, form.

15 BY THE WITNESS:

16 A. The rejection rate of 1 to 3 percent is  
17 historically what it's always been. So we are back in  
18 the zone. One of the reasons for rejection is that the  
19 mail ballot was not signed by the voter. It was signed  
20 by somebody other than the voter. The voter was not  
21 the one who signed the carrier and the application.

22 BY MR. FREEMAN:

23 Q. So that wasn't the answer to my question.  
24 My question was, to your knowledge, were 2.7 percent or  
25 more of mail ballots cast in any statewide election in



1 Texas fraudulent because they were cast by someone  
2 else?

3 MS. HUNKER: Objection, form.

4 BY THE WITNESS:

5 A. Again, I don't know how many were  
6 fraudulent because they were cast by somebody else. I  
7 know ballot boards reject mail ballots because the  
8 voter was not the one who signed them.

9 BY MR. FREEMAN:

10 Q. Do you have any basis to believe based on  
11 your knowledge and experience that over 2 percent of  
12 mail ballots in any statewide election were cast by  
13 someone other than the voter in whose name the ballot  
14 was cast?

15 A. Again, I don't know the answer to that  
16 question. The answer I have got is rejection, and  
17 rejection because they're not the same person is the  
18 most common rejection reason.

19 Q. Because they are not the same person or  
20 because they didn't sign?

21 A. Because they are not the voter. The  
22 signatures don't match.

23 Q. When a signature doesn't match -- strike  
24 that.

25 If an election administrator or ballot

1 board has reason to believe that voter fraud has  
2 occurred, are they required to refer that for criminal  
3 prosecution?

4 A. They are not required to. They are  
5 required to report mail ballots that are rejected for  
6 signature mismatch to the Attorney General's Office.

7 Q. Do you know how many of those signature  
8 mismatches have led to successful prosecutions for mail  
9 ballot impersonation?

10 A. I do not. That's a question for the  
11 Attorney General's Office.

12 Q. Do you personally in your work as an  
13 election administrator statewide presume all signature  
14 mismatches are incidents of mail ballot impersonation?

15 MS. HUNKER: Objection, form.

16 BY THE WITNESS:

17 A. Signature mismatch is what we colloquially  
18 say. But the standard is, were the application and  
19 carrier envelope signed by the voter? That's the  
20 standard. If they are rejected because the signatures  
21 don't match, they are rejected really because they are  
22 not made by the voter or the ballot board can't  
23 determine that they were made by the voter.

24 BY MR. FREEMAN:

25 Q. But can't determine is very different from

1 an affirmative determination of voter impersonation,  
2 correct?

3 A. I don't know that they are that different.  
4 I mean if there is doubt then there is doubt.

5 Q. So you said that rejection at 2.7 percent  
6 was back in the zone. Is there any statewide federal  
7 election that has had rejection over 2 1/2 percent  
8 other than the 2022 election in your time as election  
9 administrator?

10 A. I don't know. You would have to go back  
11 and look at the data on the AC's website. I don't  
12 know.

13 Q. But when you say 1 to 3 percent is back in  
14 the zone, when were those 3 percent elections?

15 A. That's just the general idea that I have in  
16 my head of mail ballot rejection rates.

17 Q. Okay. But how did you develop that general  
18 idea in your head?

19 A. Over time. It's obviously higher in  
20 primaries because there is more reasons to fail in  
21 primaries.

22 Q. What are those reasons just so we know?

23 A. The extra reasons are that you don't on  
24 your application submit a party reference. You are not  
25 going to get a primary ballot if you don't submit a

1 party preference because they don't know which one to  
2 send you. Obviously people get applications sent to  
3 them by campaigns and political parties, and they will  
4 often keep sending in every application they get even  
5 if it's change in their primary preference from one to  
6 the other. So a lot of them come in late because they  
7 didn't get a ballot sent to them on time because they  
8 kept changing what they wanted.

9 Q. What would you consider in the zone for a  
10 primary election?

11 A. I don't have a sense for that. I know it's  
12 more because there is many more issues that can come  
13 up.

14 Q. Okay. Can we all agree the decline in mail  
15 ballot rejection rates from the primary to the primary  
16 runoff to general is a good thing?

17 A. Absolutely.

18 Q. There are many factors that contributed to  
19 that decline?

20 A. Agreed.

21 MR. FREEMAN: If we could mark this as Exhibit  
22 21.

23 (WHEREUPON, a certain document was  
24 marked Deposition Exhibit No. 21,  
25 for identification, as of 3/28/23.)

1 BY MR. FREEMAN:

2 Q. What's this document?

3 A. It appears to be an NPR printout of a  
4 story.

5 Q. It's a story about ballot rejections in  
6 Texas?

7 A. That's what it looks like, yes, sir.

8 Q. I ask you to start by turning to page 3.  
9 For the record he's been mentioned a few times, but who  
10 is Sam Taylor?

11 A. Sam Taylor is Assistant Secretary of State  
12 for Communications.

13 Q. Did you work with Mr. Taylor to develop any  
14 talking points or answers regarding mail ballot  
15 rejection rates in the 2022 general?

16 A. It's not exactly how it works. Sam usually  
17 asks our side of the street for information, then he  
18 crafts his own talking points.

19 Q. Did you contribute information that he used  
20 to craft talking points regarding mail ballot rejection  
21 rates in the 2022 general?

22 A. So the numbers are the numbers. I mean so  
23 the numbers were most important in determining what  
24 talking point he was going to have.

25 Q. Did you contribute any other information?

1           A.       You know, we are on the county advisory  
2 call every other week, and Sam usually is on those  
3 calls as well. So he hears the information and  
4 feedback we get at the same time we get it, and we  
5 collaborate based on that information.

6           Q.       Would you agree that in this article Sam  
7 Taylor attributes the decrease in mail ballot rejection  
8 rates to several different items?

9           A.       Yes.

10          Q.       So starting on page 3, Mr. Taylor  
11 contributes the decrease in mail ballot rejections in  
12 part to updates to the return ballot in some counties;  
13 is that right?

14          A.       Agreed to the carrier envelope  
15 specifically, but.

16          Q.       Do you agree with what Mr. Taylor said  
17 there?

18          A.       Yes.

19          Q.       Was this simply the addition of a red box  
20 on the carrier envelope?

21          A.       Yes.

22          Q.       Any other updates to the return ballot?

23          A.       To the carrier envelope, I don't think so.

24          Q.       That applied in all 254 counties; is that  
25 right?

1           A.       No. I mean -- so we updated the carrier  
2 envelope with the red box, but a lot of counties had  
3 stock from the primary, and so they are still using  
4 their own stock. They didn't have to purchase new  
5 carrier envelopes because we put a red box. Not all  
6 counties used the red box one.

7           Q.       Do you know how many counties continue to  
8 use the old version of the envelope?

9           A.       I have no idea.

10          Q.       Did counties have to use the same envelope  
11 for all voters in a given election or could they use a  
12 mix of the old and new stock over the course of the  
13 election?

14          A.       They could use a mix if they needed to,  
15 sure.

16          Q.       Okay. Do you expect any further gains in  
17 reducing mail ballot rejection due to updates on the  
18 carrier envelope?

19          A.       I don't know. Depends on what laws do or  
20 do not change in this legislative session.

21          Q.       Absent further legislative change, do you  
22 expect further gains in reducing mail ballot rejection  
23 due to updates to the carrier envelope?

24          A.       No.

25          Q.       Does Mr. Taylor attribute the decrease to

1 additional voter information included in mail ballots  
2 by local officials?

3 A. I agree with that.

4 Q. Do you agree with Mr. Taylor's position  
5 there?

6 A. I do.

7 Q. We already discussed this to some extent.  
8 But is this referring to the inserts that we discussed  
9 previously?

10 A. That's correct.

11 Q. Anything besides the inserts that we  
12 discussed previously?

13 A. Well, whatever other information counties  
14 might have put in. We don't have any ability to  
15 control what goes into the mail ballot instructions.  
16 So the counties can add to that if they want to.

17 Q. Do you know right now if any additional  
18 counties or other local officials intend to include  
19 additional voter information in mail ballot  
20 envelopes --

21 A. I would expect --

22 Q. -- in future elections who didn't in the  
23 November general?

24 A. I would expect counties that haven't added  
25 an insert probably will as the information propagates



1 amongst themselves.

2 Q. Do you know if there were any large  
3 counties who didn't include an insert previously?

4 A. I think you have asked me that question. I  
5 don't know what they did or didn't include.

6 Q. Do you expect substantial further  
7 reductions in mail ballot rejections due to inclusion  
8 of additional voter registration in mail ballot  
9 envelopes?

10 A. In the counties that haven't added an  
11 insert, if they do add an insert, yes, it will help, I  
12 think.

13 Q. But you don't know which counties those  
14 are?

15 A. I do not.

16 Q. Could it be that all counties did include  
17 inserts previously?

18 A. It could be, but it's very doubtful.

19 Q. Did Mr. Taylor also attribute the decrease  
20 in mail ballot rejections to the voter education  
21 campaign?

22 A. He did.

23 Q. Do you agree with that point?

24 A. I do.

25 Q. Do you know how much of the voter education

1 campaigns were earned media versus paid media?

2 A. I don't. That's a Sam question.

3 Q. Again, my colleague is going to be speaking  
4 with Mr. Taylor about some of these issues in greater  
5 detail. But, to your knowledge, what were the  
6 effective forms of voter education conducted by the  
7 Office of the Secretary of State to bring down ballot  
8 rejection rates in the general election period?

9 MS. HUNKER: Objection, form.

10 BY THE WITNESS:

11 A. Yes. Effectiveness of the campaign is not  
12 my area.

13 BY MR. FREEMAN:

14 Q. Okay. So you don't have any knowledge  
15 about effectiveness in general?

16 A. I don't.

17 Q. Do you know if the Office of the Secretary  
18 of State intends to conduct different forms of voter  
19 education concerning SB 1 requirements in the future?

20 A. You know, we will do another request for  
21 proposal for ideas from vendors about the voter  
22 education campaign for '24 and we will see what they  
23 come up with.

24 Q. Do you know if your office intends to  
25 conduct a greater quantity of voter education

1 concerning SB 1 mail ballot requirements in the future?

2 A. Depends upon whether or not we get more  
3 money. You know, the initial drafts of the budget  
4 include more money for that purpose. So yes, we would  
5 be spending more.

6 Q. Did the legislator provide less for their  
7 education funding in 2022 than they did in 2020?

8 A. Yes.

9 Q. So would the budget that you are seeing  
10 just be a restoration to presidential cycle levels?

11 MS. HUNKER: Objection, form.

12 BY THE WITNESS:

13 A. That's what we ask for in LAR. I think  
14 they are going beyond that. We will see.

15 BY MR. FREEMAN:

16 Q. How much media attention did ABBM and  
17 ballot rejection in the March 2022 primary receive?

18 A. How much?

19 Q. Uh-huh.

20 A. I don't know. I don't know. I have no way  
21 of quantifying that.

22 Q. Was there a lot?

23 A. There was -- there were quite a few  
24 stories, yes.

25 Q. By comparison, how much media attention did

1 ballot rejections and ABBM rejections in November  
2 receive?

3 A. Not as much.

4 Q. So would you agree that that's a decrease  
5 in sort of free media educating voters?

6 MS. HUNKER: Objection, form.

7 BY THE WITNESS:

8 A. No.

9 BY MR. FREEMAN:

10 Q. Why not?

11 A. Because the free media that educate voters  
12 is usually done locally at the county level with the  
13 county election administrator having a news story  
14 before early voting or during the ballot by mail time  
15 period. Whether that increased or decreased I have no  
16 idea. That has nothing to do with reporting on  
17 rejection rates in November of 2022.

18 Q. You don't think that voters became aware of  
19 these requirements based on stories about the problems?

20 A. I don't know how they became aware of it,  
21 but those public interest stories that occur when mail  
22 balloting begins are the way that I think a lot of  
23 voters learn about it. We will see.

24 MR. FREEMAN: If we can mark this as Exhibit 22.

25 (WHEREUPON, a certain document was

1 marked Deposition Exhibit No. 22,  
2 for identification, as of 3/28/23.)

3 BY MR. FREEMAN:

4 Q. What's this document?

5 A. It's a mass email.

6 Q. Sent by?

7 A. Me.

8 Q. To?

9 A. County election officials.

10 Q. What are you asking them to do in this  
11 email?

12 A. Consider trying to place an opinion piece  
13 in their local newspapers.

14 Q. Is this something you have done previously?

15 A. No.

16 Q. Why did you do it --

17 A. I take it back. We have definitely offered  
18 templates for opinion pieces that they could use in  
19 local newspapers before.

20 Q. Had you asked them --

21 A. What's new is taking an example from a  
22 particular county and saying, "Here's one. Use this."  
23 We have -- generally when we've done templates in the  
24 past and offered them to counties, we have just drafted  
25 a template ourselves.

1 Q. Okay. How often in the past did you  
2 provide templates for op-eds?

3 A. I don't know. Several times. It's -- what  
4 we have done them for is the ID requirements. The ID  
5 requirements when they changed for photo ID, and they  
6 changed again in 2017 --

7 Q. So --

8 A. -- or 2016.

9 Q. -- for SB 14 the voter ID law, the change  
10 to voter ID law, and SB 1, those are the three times  
11 you can recall?

12 A. That we have tried to use this form of  
13 communication to get the counties to propagate  
14 something, yes. I mean we offer templates to the  
15 counties for everything every year, every election  
16 year, but the ones that we specifically drafted, you  
17 know, for part of voter education were usually ID  
18 related.

19 Q. Do you know whether any other election  
20 administrators or officials were able to place op-eds  
21 about these requirements after this email went out?

22 A. I don't know.

23 Q. So you can't -- can you identify any other  
24 counties that did manage to place op-eds?

25 A. I don't know.

1 Q. Do you intend to submit templates or  
2 examples to county officials about SB 1 ID requirements  
3 again in the future?

4 A. Sure.

5 Q. Do you expect newspapers to be receptive to  
6 op-eds when the requirements are no longer new?

7 A. It's not just the op-eds. It's also  
8 talking to them about how to approach their local news  
9 media and getting a story placed. It's also handouts  
10 and colorful material they can use to give to the  
11 voters. So it's a full fledged campaign that Sam would  
12 know more about than I do.

13 Q. Do you expect newspapers to be as receptive  
14 to similar op-eds in the future when the requirements  
15 are no longer new?

16 MS. HUNKER: Objection, form.

17 BY THE WITNESS:

18 A. Sure.

19 BY MR. FREEMAN:

20 Q. Why is that?

21 A. Because they are always hungry for content.  
22 Local news needs content. This is good content for  
23 them. They like it.

24 Q. Do you expect substantial further  
25 reductions in mail ballot rejections due to voter

1 education?

2 A. I don't know. I mean I think as voters  
3 talk amongst themselves it's going to get better, yes.  
4 I don't know if it's substantial. You say substantial  
5 reductions. I don't know about that.

6 Q. Does your office have plans to reach  
7 different voters from those reached previously by voter  
8 education efforts on SB 1?

9 MS. HUNKER: Objection, form.

10 BY THE WITNESS:

11 A. That again is going to be part of the  
12 request for proposal. Depends on how much money the  
13 legislature gives us.

14 BY MR. FREEMAN:

15 Q. Do you have any knowledge of targeted plans  
16 to reach voters who didn't understand prior voter  
17 registration efforts?

18 A. No. I mean part of every education  
19 campaign is the feedback loop. And, you know,  
20 determination of what can be done better next time.  
21 But again, that's all done by the communications team  
22 and the vendor.

23 Q. Going back to Exhibit 21. Did Mr. Taylor  
24 attribute the decrease in voters -- strike that.

25 Did Mr. Taylor attribute the decrease in



1 mail ballot rejection rates to voters getting used to  
2 SB 1 requirements?

3 A. Yes.

4 Q. Do you agree --

5 A. He said that, you know, one of the things  
6 we have always expected was that the voters would get  
7 used to it.

8 Q. Do you agree?

9 A. Absolutely.

10 Q. If a voter had their ballot rejected, they  
11 failed to cure, correct?

12 A. If it's finally rejected, yes.

13 Q. So the cure process affords a voter an  
14 additional opportunity code to comply with SB 1  
15 requirements during a single election; is that right?

16 MS. HUNKER: Objection, form.

17 BY THE WITNESS:

18 A. If that was the reason for the initial  
19 rejection or notice of defect.

20 BY MR. FREEMAN:

21 Q. Would you agree then that even when  
22 presented with multiple opportunities to comply with SB  
23 1, each final rejection represents a voter who failed  
24 to learn and comply even with multiple opportunities?

25 MS. HUNKER: Objection, form.

1 BY THE WITNESS:

2 A. Sometimes the clock runs out on folks.

3 But, you know, I don't know what you are trying to get  
4 at. But you are assuming that the rejections were all  
5 because of SB 1. That's not a safe assumption. There  
6 are lots of reasons why mail ballots get rejected. If  
7 you want to know the list, you should go to a county  
8 and ask them.

9 BY MR. FREEMAN:

10 Q. Let's just bracket to SB 1 rejections. And  
11 say with respect to SB 1 rejections, because of the  
12 cure opportunity, everyone has multiple chances to get  
13 down their voter information, right, their ID numbers?

14 A. I don't necessarily agree with that because  
15 again the clock runs out.

16 Q. But prior to the clock running out, there  
17 is supposed to be an opportunity to cure, correct?

18 A. If they got notice before the clock ran  
19 out.

20 Q. Some voters get notice after the clock runs  
21 out?

22 A. That's right.

23 Q. With respect to the voters who did get  
24 notice before the clock ran out, many of them had a  
25 second opportunity, and nonetheless failed to get the

1 information required by SB 1 on to their ballot,  
2 correct?

3 A. Maybe. Maybe they decided not to. Maybe  
4 they deeded to cancel their mail ballot and vote in  
5 person. You know, I don't know what happened with  
6 those.

7 Q. In light of the cure opportunity, why do  
8 you expect that yet more exposure to the SB 1  
9 requirements would continue to drive down rejection  
10 rates?

11 A. Because as people learn about something and  
12 talk about it amongst themselves they get better at it.  
13 It's just a fact.

14 Q. In each new election cycle, do a new batch  
15 of voters turn 65?

16 A. We have talked about that before.

17 Q. We have. They won't have to get used to SB  
18 1 mail ballot requirements?

19 MS. HUNKER: Objection, form.

20 BY THE WITNESS:

21 A. No. But they would have heard about it  
22 from their peers.

23 BY MR. FREEMAN:

24 Q. Have additional trainings of state and  
25 local election officials helped to reduce ballot

1 rejection rates between the March primary and November  
2 general?

3 A. Yes.

4 Q. What's the county election seminar?

5 A. That's a seminar that we do every year for  
6 county election officials to teach them about election  
7 law requirements and how to implement them in their  
8 county.

9 Q. When was the county election seminar in  
10 2021?

11 A. I don't remember.

12 Q. Was it before --

13 A. July or August.

14 Q. So before SB 1 was passed?

15 A. In '21, yes.

16 Q. When was the seminar in '22?

17 A. July or August.

18 Q. After the March primary, before the  
19 November general, correct?

20 A. Agree with that.

21 Q. So based on your experience as director of  
22 elections, during the 2022 election cycle do you do  
23 most -- sorry. Did most county election officials  
24 understand the SB 1 acceptance and cure process during  
25 the November 2022 general?

1           A.           I don't know. That's a hard question. I  
2           don't know what they hear. I only know what we say.  
3           We had an election official email us a question in  
4           2017, 2017, four years after photo ID requirements were  
5           in place, asking if photo ID was required for voting.

6           Q.           That was after there had been --

7           A.           No.

8           Q.           -- a decision by the Federal court saying  
9           that the original law violated the Voting Rights Act,  
10          right?

11          A.           She was asking if photo ID was required at  
12          all. She didn't have any clue. She had been in office  
13          the whole four years. She had been to our seminars,  
14          read our materials, I presume. I don't know. But I'm  
15          saying I don't have any control at all over what the  
16          counties hear and how they interpret it.

17          Q.           Are you aware of any ballot rejection in  
18          the November general that resulted from misapplication  
19          of SB 1 by local officials?

20          A.           Any what?

21          Q.           Ballot rejections, mail ballot rejections  
22          in November that resulted -- that were the result of  
23          misapplication of SB 1 by local officials?

24          A.           I think we have talked about the  
25          misapplication of the signature requirement after the

1 introduction of rebuttal presumption.

2 Q. I mean the rejection of mail ballots based  
3 on the driver's license or Social Security number  
4 requirements?

5 A. I don't know how you can separate the two.  
6 The driver's license and Social Security number being  
7 in the voter's record is supposed to create a  
8 rebuttable presumption that the signatures are of the  
9 voter. So that signature comparison requirement, that  
10 the degree of scrutiny that's applied to the signatures  
11 part and parcel of SB 1 requirements. If the  
12 signatures were overanalyzed even though the number  
13 already matched the number in their system, then that  
14 results in a rejection because of a mistake by the  
15 ballot board.

16 Q. Okay. Are you aware of any rejections of  
17 ballots for failure to put a driver's license number,  
18 Social Security number on the carrier envelope that  
19 matches TEAM where the rejection was a result of  
20 misapplication of SB 1 by local officials?

21 A. So a voter puts a number on the envelope,  
22 that number is in their TEAM record, and they still  
23 rejected it --

24 Q. Any rejection --

25 A. -- because of that?

1 Q. Are you aware of any rejection of a mail  
2 ballot based on the number requirements because of some  
3 kind of error by a local official?

4 MS. HUNKER: Objection, form.

5 BY THE WITNESS:

6 A. I have already told you what I know about  
7 rebuttable presumption not being evenly applied.

8 BY MR. FREEMAN:

9 Q. Separate from the rebuttable presumption,  
10 just the number requirements?

11 A. I don't even know how that would be. I  
12 don't know what you are talking about.

13 Q. Okay. Let's try and ask in a way that  
14 works for you then.

15 Just a yes/no requirement, you have to have  
16 a number that matches TEAM, driver's license number,  
17 Social Security number, that requirement standing  
18 alone, that sort of bar to acceptance, are you aware of  
19 any rejection based on that bar to acceptance the  
20 ballot where the rejection was a result of a  
21 misapplication of SB 1 by local officials?

22 MS. HUNKER: Objection, form.

23 BY THE WITNESS:

24 A. I don't even know how that would be. I  
25 don't know what you are talking about.

1 BY MR. FREEMAN:

2 Q. Are you aware of any instances where the  
3 official rejected a mail ballot where a voter had put  
4 down their SSN, and had a driver's license number, and  
5 SSN on TEAM and they applied the hierarchy, for  
6 example, and shouldn't have, would that be an error by  
7 a local official in applying SB 1 to the numbers?

8 MS. HUNKER: Objection, form.

9 BY THE WITNESS:

10 A. I'm not aware of anything like that  
11 happening. What we've told them is if the number that  
12 the voter puts is in the record, they are supposed to  
13 accept it. I'm not aware of any county rejecting it  
14 with a number in the record. That would be crazy.

15 BY MR. FREEMAN:

16 Q. Good. Are you aware of any other similar  
17 types of errors by local officials where they rejected  
18 a ballot and they shouldn't have in relation to the  
19 numbers themselves?

20 A. No.

21 Q. Okay. Would you agree then you don't  
22 expect any substantial further rejection or further  
23 reductions in mail ballot rejections based on the  
24 numbers alone from training of local officials --

25 MS. HUNKER: Objection, form.



1 BY MR. FREEMAN:

2 Q. -- not based on signature?

3 A. No, I wouldn't agree with that at all.

4 Because we also train ballot boards now. We do  
5 webinars for the ballot boards themselves. Ballot  
6 boards themselves are the ones who make the call  
7 whether to accept or reject. Now I'm not aware of a  
8 ballot board rejecting a carrier envelope because  
9 somebody had a number and they should have used the  
10 other number. That's crazy talk. But there are a lot  
11 of ballot boards who either didn't give the signatures  
12 any weight at all or gave them too much weight and then  
13 rejected even though the number was in the system. So  
14 that's the part that we are going to work on educating  
15 and correcting.

16 Q. But nothing related to the numbers standing  
17 alone and not in relation to signatures?

18 A. Again, I don't know what that means. I  
19 don't know how you would do that.

20 Q. Okay. Are there any other reasons why mail  
21 ballot rejection rates decreased from the March primary  
22 to the November general that we haven't talked about?

23 A. You know, I just think -- I mean Sam calls  
24 it getting used to, but it's a process of permeating  
25 the side geist. You know what I mean? It's something

1 that filters into people's consciousness over time,  
2 that that is something that I don't know if we just  
3 call it getting used to it. But whatever it is it gets  
4 better over time, the requirements.

5 Q. Mr. Ingram, do you know what share of  
6 voters cast ballots by mail in November of 2022?

7 A. I did think of another reason they get  
8 better over time. It's because our data gets better  
9 over time. You know, the more voters that update their  
10 information with one of the numbers, the better we are  
11 going to have. If they make the ballot tracker easier  
12 to access, that's an easier way to correct the defect.

13 Q. Do you know how many voters added driver's  
14 license numbers or Social Security numbers to their  
15 voter registration file using Texas.gov during the  
16 general election period?

17 A. I don't know. I know we had over 40,000  
18 people update their registration using Texas.gov. I  
19 don't know how many of those were numbers only.

20 Q. A lot could have been address changes?

21 A. A lot could have been address changes and a  
22 lot of them could have been numbers. I don't know how  
23 many of each there are.

24 Q. You are not getting new registrants who  
25 don't provide either a driver's license number or

1 Social Security number anymore into the system; is that  
2 right?

3 A. Well --

4 MS. HUNKER: Objection, form.

5 BY THE WITNESS:

6 A. -- they've got the opportunity to have  
7 registration without either one of the numbers.

8 BY MR. FREEMAN:

9 Q. Other than the very small fraction of  
10 people who check that box, you are not getting --  
11 everyone is providing either a driver's license number  
12 or a Social Security number on their voter registration  
13 applications now, correct?

14 A. There is a box for them, but there is also  
15 a box for "I don't have either one of those."

16 Q. Do you know how many folks that you  
17 register with the box that says, "I don't have a  
18 driver's license number or Social"?

19 A. I don't. I'd agree with you it would be a  
20 small number.

21 Q. Prior to Helping America Vote Act, you  
22 could register without a driver's license number or  
23 Social?

24 A. I don't know if you could in Texas. I know  
25 there was a period of time a long time ago. But before

1 the Help America Vote Act you had to have one of those.  
2 I think we required the full nine, not the last four.  
3 Help America Vote Act made us reduce it to the last  
4 four only.

5 Q. Okay. But you are not getting a large  
6 influx of additional voters now with no SSN, no DL?

7 A. Agree with that.

8 Q. And so attempts to add information are not  
9 going to make further substantial changes in the future  
10 because you have that for most of them already, right?

11 A. Well, I mean that's the whole issue, right?  
12 We have got less than half a percent who have neither  
13 one of those numbers in the record, right. Only if  
14 that half of a percent tries to vote by mail and then  
15 adds the number, will we get it, but that does happen,  
16 and we will work on that last 93,800 folks to get them  
17 a number.

18 Q. What are you doing affirmatively to work to  
19 get them a number?

20 A. Well, what I talked about. We have changed  
21 Texas.gov where we get no value supplied to us if  
22 anybody logs on to us. We are telling voters if they  
23 have their application rejected for lack of a number in  
24 the system that's how you add the numbers to your  
25 record. I mean I don't know how else you would do it.

1 The voter has to take responsibility to do that  
2 themselves. They have a mechanism for doing it  
3 electronically or they can fill out a paper  
4 application. But over time as they try to vote by  
5 mail, that number is going to decrease. It will not  
6 get bigger.

7 Q. Did you see substantial movement in that  
8 number between the March primary and the November  
9 general?

10 A. Not then, no. We didn't check then.

11 Q. You didn't check to see how many people had  
12 no driver's license number and no Social Security  
13 number?

14 A. That's right. We had already checked it at  
15 the end of '21. And then we added as many as we could  
16 so we knew what the number was going into the end of  
17 the year, and we did it at the end of December '22?

18 Q. What was the change from the end of '21 to  
19 the end of '22?

20 A. I don't know. I have got the end of '22  
21 numbers in my head, but I don't remember what they are.  
22 I mean before we did anything at all, we had about a  
23 million records that didn't have a driver's license,  
24 and a million that didn't have a Social, right. We  
25 had, I don't know, 160,000 that didn't have either one.

1 At the end of '22 we have got 389 that have a DL, but  
2 no Social, and we have got 298 that have a Social but  
3 no DL. We have got 93,000 that don't have either one.

4 Q. Do you expect substantial further changes  
5 in decreasing that -- those numbers moving forward?

6 MS. HUNKER: Objection, form.

7 BY THE WITNESS:

8 A. I don't know what you mean by substantial.  
9 I expect that the numbers are going to decrease over  
10 time. They are never going to get bigger than they are  
11 now. They will decrease.

12 BY MR. FREEMAN:

13 Q. Okay. Did the rate at which they  
14 decreased -- strike that.

15 Did the share of numbers that you  
16 decreased -- you know what, we will move on then.

17 Mr. Ingram, do you know what share of  
18 voters cast ballots by mail in November of '22?

19 A. I don't.

20 Q. Do you know if it was greater or lessor  
21 than the share that cast ballots by mail in November of  
22 2018?

23 A. I don't know. I think it would probably be  
24 comparable number to 2018. It was less than 2020.

25 Q. Do you know whether turnout in general was

1 higher in 2022 or lower in 2018?

2 A. I don't remember. They were both quite a  
3 lot higher than normal mid-term elections, but I think  
4 '22 may have been a little less.

5 Q. To your knowledge, did March 2022 ballot  
6 rejection deter some eligible voters from trying to  
7 vote by mail in November?

8 A. No idea.

9 Q. Did any election administrators or clerks  
10 indicate to you that voters were concerned about mail  
11 ballot rejection in November of 2022?

12 A. Well, as you can see from the email, voters  
13 aren't shy about expressing directly to us. I don't  
14 know if we have to rely on county officials for that.

15 Q. Did any county officials indicate to you  
16 that voters were concerned in November of 2022 about  
17 ballot rejection?

18 A. Not any more than normal.

19 Q. What's normal in terms of those types of  
20 concerns?

21 A. Well, I mean whenever you send mail ballots  
22 you are relying on the post office and you are relying  
23 on whatever else. There is always trepidation until  
24 you get confirmed that your ballot was accepted.

25 Q. Are these concerns valid?

1 A. Sure. Absolutely.

2 Q. Do you trust the post office? We already  
3 discussed concerns that were raised with your office  
4 directly about rejection of mail ballots. Were these  
5 concerns valid?

6 A. I don't know.

7 MR. FREEMAN: Take a break for a minute.

8 (WHEREUPON, a recess was had.)

9 BY MR. FREEMAN:

10 Q. Thank you, Mr. Ingram. I will pass you to  
11 Ms. Perales. But I think we all need a lunch break  
12 before then.

13 A. Great.

14 (WHEREUPON, a recess was had.)

15 EXAMINATION

16 BY MS. PERALES:

17 Q. We are back on the record. Mr. Ingram, my  
18 name is Nina Perales and I represent the LUPE  
19 Plaintiffs. I'm with MALDEF. We know each other,  
20 don't we?

21 A. We do.

22 Q. We have met in the past usually at the  
23 legislature?

24 A. Agreed.

25 Q. Yes. You have been to so many more



1 hearings than I have, much to your credit.

2 I am going to endeavor not to tread the  
3 same ground as Mr. Freeman did, but if that means that  
4 from time to time I'm pausing or flipping pages  
5 forward, it's only because I'm trying to make sure I  
6 don't re-ask any questions that are in my outline. I  
7 hope you don't take it as me trying to delay or  
8 anything. If I'm quiet, I'm skipping questions. How  
9 about that?

10 A. That's fine. Yes.

11 Q. Thank you. Thank you. Just a few more  
12 emails to go over with you along the same lines of  
13 emails that Mr. Freeman went over with you?

14 A. Okay.

15 Q. I'm going to mark those.

16 MS. PERALES: Can we mark this one, please.

17 (WHEREUPON, a certain document was  
18 marked Deposition Exhibit No. 23,  
19 for identification, as of 3/28/23.)

20 BY MS. PERALES:

21 Q. Mr. Ingram, can you identify this document?

22 A. It looks like an email to our office from  
23 Barry Brandt, and the response.

24 Q. Was it an email to -- well, it says the  
25 email is addressed to elections internet. Is that the

1 elections division of the Texas Secretary of State?

2 A. It is.

3 Q. Then there is -- is there at the very top  
4 of the document a response from the Texas Elections --  
5 Texas Secretary of State Elections Division?

6 A. Agree with that.

7 Q. It seems to be coming from an  
8 administrative group and the CC line is elections  
9 internet. Do you know who actually sent this email?

10 A. I don't. I don't.

11 Q. Do you have an A.T. Montgomery?

12 A. We do have an Andre Montgomery.

13 Q. I noticed in among the letters there is an  
14 A.T., then the beginning of the name Montgomery. Would  
15 it be fair to say that the person who sent the email,  
16 Barry Brandt, is expressing that he was having a  
17 problem -- well, he says he was having a problem with  
18 registration, but he also says that he and his wife  
19 sent in the form with an a SSN but not a license  
20 number. Then he's talking about ballot processing. Do  
21 you see that there?

22 A. I do.

23 Q. He says that he received confirmation that  
24 he was registered to vote, but that also received a  
25 notice saying he didn't provide the required

1 information; is that right?

2 A. Right.

3 Q. I notice that the response from the  
4 Secretary of State mentioned both getting a ballot and  
5 registering to vote because perhaps there was some  
6 confusion on the part of the voter about being --  
7 whether or not to -- whether or not his and his wife's  
8 ballots were processed. Did you see that there?

9 A. I agree with that.

10 Q. Do you know whether this was identified by  
11 the Secretary of State as an issue involving providing  
12 an ID number for email voting?

13 A. I don't know. The voter doesn't know what  
14 they are really talking about. Our response covers  
15 both because we don't know what they are talking about.

16 Q. Okay. There were some mentions in here  
17 about ballot by mail TEAM in the email. I wasn't  
18 sure --

19 A. Right.

20 Q. -- if you understood perhaps more.

21 A. I don't. I mean I know if somebody  
22 registered to vote and supplied their last four of SSN  
23 of course they would be registered. It wouldn't be  
24 rejected. So that obviously wasn't a voter  
25 registration. Then he says they received a notice that

1 their application for registration had been reviewed  
2 and included all of the information. So I have no idea  
3 what's going on with this fellow. We would have to  
4 look him up to even begin to have an idea. Call up the  
5 county, figure out what county it is.

6 Q. He even included what might be his and his  
7 wife's VUID numbers there at the very end, didn't he?

8 A. He did. Which indicates he's registered to  
9 vote. So really this doesn't make very much sense.

10 Q. Okay. Thank you.

11 MS. PERALES: Can we mark this one, please.

12 (WHEREUPON, a certain document was  
13 marked Deposition Exhibit No. 24,  
14 for identification, as of 3/28/23.)

15 BY MS. PERALES:

16 Q. Mr. Ingram, can you identify this email?

17 A. Yes, it appears to be an email from Susan  
18 Johnson to our office. And we did talk about this one  
19 earlier.

20 Q. Did you?

21 A. Yes.

22 Q. Okay. I will put it aside.

23 A. We can talk about it again, but it's  
24 already in the stack.

25 Q. So we did mark it, but we are not going to

1 discuss it if you have already discussed it.

2 I'd like to ask you some questions about SB  
3 1 that are not related to mail ballots?

4 A. Okay.

5 Q. I think what might make the most sense is  
6 to go ahead and mark SB 1 just so that you have it for  
7 reference.

8 A. Okay.

9 Q. Because I understand that it's kind of  
10 spread out all over the election code, and I don't want  
11 to make you have to look it up that way.

12 A. Sure.

13 Q. Let's go ahead and mark that as No. 25.

14 (WHEREUPON, a certain document was  
15 marked Deposition Exhibit No. 25,  
16 for identification, as of 3/28/23.)

17 BY MS. PERALES:

18 Q. If you would turn with me to section 2.04.

19 MS. HUNKER: Nina, for clarity of the record, can  
20 you confirm this is the enrolled version?

21 MS. PERALES: I can confirm it's the enrolled  
22 version.

23 MS. HUNKER: Thank you.

24 MS. PERALES: What I'm thinking about is whether  
25 I want to go over it now or in the next portion of the

1 deposition. Let me think about this. I think we might  
2 put it aside. Don't laugh at me, Dan. I'm thinking my  
3 way through it as I go.

4 BY MS. PERALES:

5 Q. I think, Mr. Ingram, I'm going to -- it is  
6 the enrolled, and I can confirm that for you even  
7 though it's not signed on the back, but I think I  
8 should probably save that so I don't have to ask you  
9 the questions twice, first as Keith Ingram, and then  
10 later as the Secretary of State if that's okay with  
11 you?

12 A. Sure.

13 Q. I said out loud that Dan was laughing at  
14 me. Now he's worried about the record.

15 I have some questions for you about voter  
16 assistance.

17 A. Okay.

18 Q. Some of which I will ask of the Secretary  
19 of State's office, but I do have a few Keith Ingram  
20 questions about voter assistance.

21 I will ask you to turn to Exhibit 25  
22 section 6.04, I believe. Would you agree with me that  
23 SB 1 section 6.04 modifies the oath that a voter  
24 assistor takes when they help a voter in the polling  
25 place?

1 A. Agree with that.

2 Q. There are other provisions that modified  
3 the oath of assistants that an assistor would complete  
4 on a mail ballot; is that correct?

5 A. Yes.

6 Q. So if you go to the top of page 53 with me.  
7 And we see starting in line two and ending with line  
8 four, would it be fair to say that SB 1 added to the  
9 assistor oath the following language, quote, reading  
10 the ballot to the voter, directing the voter to read  
11 the ballot, marking the voter's ballot or directing the  
12 voter to mark the ballot, unquote.

13 A. Agreed.

14 Q. When SB 1 was enacted, it's correct that  
15 the Secretary of State's Office changed the voter  
16 assistance oath form to include this additional  
17 language; is that correct?

18 A. Agreed, and to strike the language that was  
19 stricken in law.

20 Q. Yes. There are some other additions and  
21 strike out as well. But I just wanted to stick with  
22 the language that follows confining the assistance of  
23 the assistor?

24 A. Agreed.

25 Q. You also incorporated this confining

1 language with the mail ballot assistor oath as well,  
2 correct?

3 A. Yes.

4 Q. Then at a certain point in time the  
5 Secretary of State modified the assistance form again;  
6 is that correct?

7 A. That's correct.

8 Q. Would it be fair to say that happened after  
9 the 2022 primary election?

10 A. Yes, it happened in June of '22. The  
11 change happened in July, but the order from the court  
12 requiring the change happened in June.

13 Q. When you say order of the court, is that  
14 the order of the District Court Judge Pitman in the  
15 litigation known as Organization of Chinese Americans?

16 A. I agree it's that case. I think of it as  
17 the Mallika Das case.

18 Q. Ms. Mallika Das was the original first  
19 plaintiff, correct?

20 A. That's right.

21 Q. She passed away during the course of the  
22 litigation?

23 A. She did.

24 Q. Then the group that we call as shorthand  
25 OCA, Organization of Chinese Americans, they continued



1 the case, correct?

2 A. They did.

3 Q. That case went up to the Federal Circuit  
4 and then came back down, correct?

5 A. It did.

6 Q. And would it be fair to say that it was the  
7 District Court's opinion in 2018 in validating portions  
8 of the election code on voter assistance at that time  
9 that went up to the Fifth Circuit and was affirmed?

10 MS. HUNKER: Objection, form.

11 BY THE WITNESS:

12 A. Agreed that the Fifth Circuit said this  
13 order was a little too broad, and told him to narrow  
14 it, but basically.

15 BY MS. PERALES:

16 Q. The language -- strike that.

17 The order from the court that -- the  
18 District Court that was upheld had to do with the scope  
19 of assistance that could be given by a voter assistor,  
20 correct?

21 A. Agreed that it included interpretation.

22 Q. Yes. So in July of 2022 as you mentioned  
23 when the Secretary of State modified the assistance  
24 oath form it was in response to a later order of Judge  
25 Pitman in the OCA case, correct?

1 A. That's correct.

2 Q. That later order had to do with  
3 invalidating language that had been put in by SB 1,  
4 correct?

5 A. Agreed.

6 Q. And that language was invalidated, and you  
7 modified the form both for the in-person voter  
8 assistance as well as on the mail ballot, correct?

9 A. That's correct. And the signature sheet  
10 for FPCA voters.

11 Q. Would you agree with me that the language  
12 that Judge Pitman invalidated was the language that you  
13 and I reviewed a little bit earlier on page 53 of this  
14 exhibit where the assistor says they will confine their  
15 assistance to quote, reading the ballot to the voter,  
16 directing the voter to read the ballot, marking the  
17 voter's ballot or directing the voter to mark the  
18 ballot, unquote?

19 MS. HUNKER: Objection, form.

20 BY THE WITNESS:

21 A. Agreed. Yes.

22 BY MS. PERALES:

23 Q. And that order of Judge Pitman came down  
24 approximately June 6 of 2022, correct?

25 A. That's my recollection, yes, ma'am.

1 Q. How did you learn of the June 6, 2022  
2 decision by Judge Pitman, which went to this language  
3 in the oath that had been added by SB 1?

4 MS. HUNKER: I'm going to object on  
5 attorney-client grounds and advise my client to only  
6 answer the question to the extent it doesn't get into  
7 the substance of any attorney-client privilege.

8 BY MS. PERALES:

9 Q. You could answer if it didn't involve  
10 having a conversation with your attorney.

11 A. Right. Well, what about an email from my  
12 attorney?

13 Q. That counts as attorney-client.

14 A. That's what I think. I don't know how to  
15 answer that question.

16 Q. Okay. I figured since you are an attorney  
17 yourself, that you might have been on some distribution  
18 list or something where you learned about it otherwise?

19 A. No, it got sent to us by the lawyers.

20 Q. Then I won't ask any more about that.

21 Had you been following the impact of Judge  
22 Pitman's 2018 decision on the scope of voter assistance  
23 in your job as the director of elections?

24 A. Sure.

25 Q. It would effect how the election judges or

1 poll workers conduct voting in the polling place,  
2 correct?

3 A. That's right.

4 Q. To some degree, although it might not have  
5 been visible to you, it would effect how people might  
6 offer assistance in the mail ballot process?

7 A. Agreed. Yes. The thing that changed is we  
8 used to have a qualification for interpreter that they  
9 had to be registered voter of the county where they  
10 were interpreting, and voter assistant obviously didn't  
11 have that limitation. It could be anybody of the  
12 voter's choosing except for their boss or their labor  
13 union. The court's order in 2018 said that  
14 interpretation is assistance, a form of assistance, and  
15 it needs to have the same standard so you can't require  
16 it be a limited registered voter of the county. So  
17 that's what changed. And of course we implemented that  
18 order.

19 Q. An elegantly succinct summary of the  
20 court's ruling.

21 Did you also understand Judge Pitman's 2018  
22 ruling and the Fifth Circuit's affirmant to mean that  
23 assistance was broad enough to encompass more activity  
24 than just reading or marking the ballot? For example,  
25 it would include interpretation, but it might also

1 include other acts that could assist a voter in casting  
2 a ballot, like helping them physically navigate the  
3 polling place?

4 MS. HUNKER: Objection, form.

5 BY THE WITNESS:

6 A. Right. I don't know. That wasn't the  
7 focus of the Court's order, but obviously the assistant  
8 has to assist the voter in mobility if that's what they  
9 need in order for them to vote. That's not anything  
10 that's ever been in question. What was in question was  
11 interpretation.

12 BY MS. PERALES:

13 Q. Specifically in that case. But did you  
14 notice language in that case that said that the act of  
15 voting encompasses a range of activities and thus might  
16 imply a range of types of assistance?

17 A. Agreed with that.

18 MS. HUNKER: Objection, form.

19 BY THE WITNESS:

20 A. This language didn't change that fact.

21 BY MS. PERALES:

22 Q. So --

23 A. The language in SB 1 that we are talking  
24 about didn't change the facts that assistance  
25 encompasses all of the forms of assistance a voter

1 needs to get to the poll, get to the booth, get out of  
2 the polls.

3 Q. In your view, that's how you understood it?

4 A. That's how I understood it. That's how we  
5 implemented it.

6 Q. It's also possible though that if somebody  
7 had to sign a form under oath saying that they would  
8 confine their assistance to reading and marking the  
9 ballot, that that assistor, who is a member of the  
10 public, would know -- not necessarily need special  
11 training, might think they had to limit their  
12 assistance to just those acts?

13 MS. HUNKER: Objection, form.

14 BY THE WITNESS:

15 A. I don't know if that ever happened. We  
16 didn't get any questions about it. If we had gotten  
17 the question about it we said obviously whatever the  
18 voter needs to vote successfully you can assist with.

19 BY MS. PERALES:

20 Q. That question would have come from a poll  
21 worker or an election judge or county election  
22 official?

23 A. Or a voter who needed an assistant or  
24 assistant. We get calls from all of those folks.

25 Q. You mentioned you weren't sure if it ever

1 happened. Would it be fair to say your office never  
2 received any queries of that sort?

3 A. I don't believe we did, but we could have  
4 gotten one or two I don't know about.

5 Q. I'm trying to figure out the best way to  
6 ask this question. When SB 1 was moving through the  
7 2021 legislative sessions, and of course in the regular  
8 session, it had a different number, right?

9 A. Yes, it did.

10 Q. HB 6, SB 7. So there were predecessor bill  
11 numbers to what ultimately got passed as SB 1. But as  
12 SB 1 was moving through the 2021 legislative session,  
13 did you think that the language in SB 1 section 6.04  
14 might run contrary to Judge Pitman's decision in the  
15 OCA case?

16 A. It never entered our mind that it was  
17 changing the scope of assistance.

18 Q. So would it be fair to say then you never  
19 raised that concern to any legislator who might have  
20 sought your view?

21 A. I agree with that. This is not something  
22 we raised.

23 Q. When Judge Pitman decided in June of 2022  
24 that the language that SB 1 added to the oath was  
25 almost indistinguishable from the language that he had

1     invalidated in the prior version of the election code,  
2     and then he said that that language could not go  
3     forward from SB 1, were you surprised?

4             MS. HUNKER: Objection, form.

5     BY THE WITNESS:

6             A.        I don't know if I was surprised. I mean  
7     disappointed, because I didn't think it changed  
8     anything, but happy to take it out if that's what he  
9     thinks.

10    BY MS. PERALES:

11            Q.        Did you have any sense that Judge Pitman  
12    might decide that the language from SB 1 which tracks  
13    so closely with the invalidated provisions in the  
14    election code might be problematic?

15            MS. HUNKER: Objection, form.

16    BY THE WITNESS:

17            A.        Again, never entered our mind it was  
18    changing the scope of assistance.

19    BY MS. PERALES:

20            Q.        Besides changing the forms in the summer of  
21    2022, in July of 2022, and by the forms I mean the oath  
22    of assistance for in-person assisting and for mail  
23    ballot assistance, what additional steps did you  
24    remember your office taking to implement Judge Pitman's  
25    June 2022 order?



1           A.       So we sent out a mass email with a revised  
2       oath of assistance forms in July, and then we sent a  
3       follow-up email after that where we had changed  
4       everything else that had the oath of assistance on it.

5           Q.       Do you remember getting any questions  
6       either from election administrators or election workers  
7       or the public about this change in the oath of  
8       assistance?

9           A.       We did get questions from election  
10      officials, but the questions were not regarding the  
11      substance. The questions were, "Can I use the old  
12      stock of the form?" So we made sure to tell everybody  
13      that you can use old stock, but you have to redact the  
14      offending language from the Judge's order. So where it  
15      starts with, "I will confine," that since had to be  
16      redacted either with Sharpie or White Out or some  
17      sticker or some kind of way.

18          Q.       When you say where it starts with, "I will  
19      confine," you are pointing to line two of page 53 of  
20      Exhibit 25?

21          A.       That's correct. I'm sorry.

22          Q.       Thank you.

23                    Did you get any questions about the  
24      permissible scope of assistance activities for either  
25      in-person or mail voting after the 2022 primary?

1 A. No. Again, that's never been an issue so  
2 it never was.

3 Q. Would you say it's largely handled by the  
4 counties?

5 A. I would say that the counties are the ones  
6 who deal with it directly, but our office is the one  
7 teaching them. We didn't teach this as a change.

8 Q. But you did amend the form?

9 A. We did.

10 Q. Because SB 1 required it?

11 A. The law changed, the words change, but the  
12 scope of assistance was substantively the same.

13 Q. That was the way you understood it?

14 A. That was the way we understood it.

15 Q. I have a clarifying question for you.  
16 Prior to HAVA, the Help America Vote Act, there wasn't  
17 a requirement on Federal forms for a voter to provide  
18 either their driver's license number or the last four  
19 of their Social; is that correct?

20 A. I agree with that.

21 Q. You had mentioned earlier in the  
22 deposition, and this is what I wanted to follow up on,  
23 that Texas prior to HAVA did require a voter registrant  
24 to put a Social Security number; is that correct?

25 A. I'm not sure. I would have to go back and

1 look at the form. I know that we have registrations  
2 from before HAVA that have full nine Social, and DL.  
3 We have had those for a long time before HB2512. They  
4 were part of the voter registration system that I  
5 inherited when I began this job in January of 2012. At  
6 that point we had about six million full nines, and the  
7 only way we would have gotten them is from a voter  
8 registration application.

9 Q. In my mind I was trying to figure out how  
10 you could have voters who didn't have either a social  
11 or a driver's license if they are registered to vote,  
12 but they didn't have either of those numbers on file  
13 with the county. Is it possibly the case that there  
14 was a time period where folks could register to vote  
15 without the full nine?

16 A. I agree with that, yes, absolutely.

17 Q. Do you think that's where this group was  
18 coming from that has neither a driver's license or a  
19 Social in their record?

20 A. I do, and also ones without date of birth.

21 Q. Yes.

22 So these would necessarily have been people  
23 who registered prior to 2012 and possibly even earlier  
24 than that?

25 A. I agree they would have registered to vote

1     sometime after January of '66 whenever the voter  
2     registration system came into play. And, you know,  
3     sometime between then and the '90s, you know. I have  
4     one of my employees in my -- former employees in my  
5     office who registered to vote in the '60s. She's got  
6     neither number on her record.

7             Q.        Would it also be true that that person  
8     would have had to not move from one county to another?

9             A.        Well, there would have to have been no  
10    changes, that's right. So she would have still lived  
11    in the same place which, you know, her mother's house  
12    is where she is registered to vote. That's where she  
13    still has mail.

14            Q.        Would it be fair to say that folks who  
15    registered that long ago are a good number of them  
16    might also be eligible to vote by mail because they are  
17    over age 65?

18            MS. HUNKER: Objection, form.

19    BY THE WITNESS:

20            A.        I would agree with that. Like I mentioned  
21    before, we have got about half a percent of the voter  
22    records that don't have either number in them. And in  
23    the last election, November of '22, we had 163 mail  
24    ballots that were rejected for not having a number.  
25    And so that's half of a half percent. So the numbers

1 don't exactly match up the way you would expect them  
2 to, but that's because people voted in-person. Some  
3 portion of them obviously are deceased. We don't have  
4 a record. We don't have a way to match their record  
5 and get them to move from the roles unless the family  
6 notifies us they are deceased.

7 BY MS. PERALES:

8 Q. Did you say earlier about 93,000 people  
9 appear in your database as having neither Social or  
10 driver's license number?

11 A. About 93,800, close to 94,000, but not  
12 quite.

13 Q. But the number of -- now, when you mention  
14 the 163, that's tied to the number of mail ballots that  
15 have been marked as rejected because of some failure to  
16 provide an ID number; is that right?

17 A. No. They were rejected specifically  
18 because there was a number provided by the voter, but  
19 there wasn't a number in their record.

20 Q. Okay. Got it.

21 A. That's what's reported to us by the  
22 counties. That's the best information we have. I  
23 don't want to be giving the impression it's 100 percent  
24 accurate.

25 Q. Thank you.

1                   In your position as director of elections,  
2                   would it be fair to say that you frequently testified  
3                   before the legislature as a resource witness on  
4                   election related bills?

5                   A.           Yes.

6                   Q.           That's probably how the public knows you  
7                   best is that you were at so many of these hearings and  
8                   testifying on bills, right?

9                   A.           I don't know how they know me, but they do  
10                  know me.

11                  Q.           Yes. Well, now with video they can watch  
12                  you from Amarillo and still see you testify on election  
13                  bills?

14                  A.           That's correct.

15                  Q.           In addition to testifying in public  
16                  hearings, would it be fair to say that you also  
17                  provided advice to either committees or individual  
18                  legislators about bill language?

19                  A.           Agree with that.

20                  Q.           Would it be fair to say that you offered  
21                  proposed language for bills to achieve what a  
22                  particular legislator or committee chair might want to  
23                  accomplish?

24                  A.           Agreed that's one of the things that we try  
25                  to do. If they have a goal and they don't have the

1 exact verbiage that they want to use, then we try to  
2 provide that for them if we can, if they ask for it.

3 Q. Is it the case also that legislators have  
4 asked you whether certain language that they have in  
5 mind would essentially work in the real world under the  
6 view of your office The Secretary of State?

7 A. Agree that's one of the thing -- one of the  
8 advice areas that we give.

9 Q. Is it the case that sometimes you might get  
10 bill language from another source and pass that along  
11 to legislators?

12 A. Not usually, no.

13 Q. Did you ever receive proposed bill language  
14 or proposals from Alan Vera that you passed along to  
15 legislators?

16 A. I don't think so.

17 Q. You don't ever remember saying in one of  
18 the hearing rooms that you had gotten language from  
19 Alan Vera and passed it along to legislators for a  
20 bill?

21 A. I mean if a legislator asked for Alan's  
22 language we would give it to him if we had it.

23 Q. I'm going to catch up with myself. Can you  
24 tell me who is Alan Vera?

25 A. Alan Vera is the chairman of the Ballot

1 Security Committee in Harris County Republican Party.

2 Q. That title is a mouthful. You got it just  
3 right.

4 A. I have heard it a bunch of times.

5 Q. Let's say for the last session, 2021  
6 session when we saw HB 6, SB 7, SB 1 moving along,  
7 approximately how many times did Alan Vera communicate  
8 with you by any means?

9 A. About those bills in particular? Not  
10 often.

11 Q. Would you say every week?

12 A. Well, I mean I would see him every week at  
13 the elections committee, sometimes at state affairs,  
14 but we didn't talk about SB 1 or SB 7 every week. I  
15 didn't talk to him about substantive legislation very  
16 often at all.

17 Q. Would it be fair to say that he emailed you  
18 from time to time with suggestions on substantive  
19 legislation?

20 A. He definitely emails, but rarely. It's not  
21 an everyday occurrence.

22 Q. Would he sometimes, as they say, button  
23 hole you in the hallways and try to talk to you about  
24 legislation or proposals touching on some of the  
25 sections of SB 1?



1 A. Occasionally, yes.

2 Q. Do you ever remember asking Mr. Vera for a  
3 copy of his poll watcher training presentation that he  
4 does over there in Harris County?

5 A. He volunteered it.

6 Q. Did you at some point acquiesce and end up  
7 having him send it to you?

8 A. My standard answer when anybody wants to  
9 send something is, "Please send it. I look forward to  
10 reading it." I never would say the opposite.

11 Q. Do you ever recall getting any other types  
12 of documents that Mr. Vera would send to you or to your  
13 office?

14 A. He corresponds with us, yes. I don't know  
15 what you are talking about in particular, but yes.

16 Q. In addition to emailing you and catching  
17 you in the hall for conversation or in the committee  
18 room, would Mr. Vera ever call you or other people in  
19 your office to your recollection?

20 A. Yes.

21 Q. He would call to make suggestions about  
22 legislation; is that right?

23 A. If he called me and made a suggestion about  
24 legislation, I would refer him to the bill office. I  
25 wouldn't purport to carry his water ever.

1 Q. Would he sometimes though want to engage  
2 you on substantive proposals?

3 A. I don't know what you mean. I mean people  
4 often try to engage us. They -- I think of it as them  
5 working the ref. They see us as the referee, they try  
6 to work the ref. Alan Vera is one of those people that  
7 does that.

8 Q. Would it be fair to say then he would have  
9 specific ideas in mind of how he, let's say,  
10 substantive proposals that he had in mind that maybe he  
11 would want to see added either as an amendment or as a  
12 committee substitute and he might want to talk to you  
13 about it in case you would have the ear of someone  
14 else?

15 MS. HUNKER: Objection, form.

16 BY THE WITNESS:

17 A. I never purported to carry his water. I  
18 want to make that very clear. He never demanded that  
19 we talk to a legislator on his behalf because he's  
20 perfectly capable of going to their offices himself.  
21 That's not the way that worked. The way that worked is  
22 I'm advocating for this or that, will it work? He  
23 asked us the same kind of questions that legislators  
24 ask. Generally he already thought it would work so  
25 it's not even a question that he would ask.

1 BY MS. PERALES:

2 Q. So I'm definitely not trying to get you to  
3 say that you personally advocated for his proposal.  
4 Not asking so much about what Keith Ingram did with  
5 information, but I'm asking more about from the Alan  
6 Vera side of things. Would he send you things? Would  
7 he approach you with substantive proposals that he had  
8 in mind?

9 A. Maybe. I can't think of anything. But  
10 that's just not the way it works for him and us.

11 Q. I know there is this other part of Alan  
12 Vera where he might have been trying to get you to  
13 follow up on complaints about, you know, irregularities  
14 he wanted you to follow up. I definitely am not asking  
15 about that so much as I'm asking about the legislative  
16 advocacy he was doing.

17 A. I understand. But he's a very capable  
18 advocate on his own behalf with legislators. He  
19 doesn't need us to help him with that.

20 Q. When you -- okay. Now we are going to  
21 leave Alan Vera behind. I'm not going to ask you more  
22 Alan Vera questions.

23 When you would communicate with  
24 legislators, committee chairs or staff, is it fair to  
25 say that you might have that communication by email?

1 A. Agreed.

2 Q. Would it be fair to say that that  
3 communication might also happen by telephone?

4 A. Agreed.

5 Q. Would it also happen by text?

6 A. Occasionally, but mostly by phone.

7 Q. The communication might involve -- well,  
8 no. Scratch that.

9 Would it be fair to say that you provided  
10 feedback to legislators or staff with respect to either  
11 SB 1 or its predecessor bills?

12 A. When requested, sure.

13 Q. But you did get those requests and you did  
14 provide that feedback for this bill SB 1?

15 A. Sure. And SB 7 and HP 6 before it.

16 Q. Okay. Did you provide any feedback prior  
17 to the bills initially being introduced into the  
18 regular session of 2021?

19 A. I don't believe so.

20 Q. So did you have any involvement in the  
21 formation or drafting of these bills prior to their  
22 introduction for the 2021 regular?

23 A. We did not. Not that I know of.

24 Q. It was more, here's the bill, and then you  
25 would be asked to come and testify on it?

1 A. Yes.

2 Q. So then just to be clear, you were not  
3 approached by legislators or staff who said, we have  
4 this idea for what we want to accomplish in the 2021  
5 session, and we -- how would you, the Secretary of  
6 State or Mr. Ingram, advise us to accomplish that?

7 A. Not beforehand, no.

8 Q. Would you ever find yourself in a situation  
9 where you might be having a conversation with a  
10 legislator or staff and you would be saying, "This is  
11 going to make things really difficult for counties"?  
12 Would you ever provide that kind of practical advice?

13 A. Sure.

14 Q. Did you do that for SB 1?

15 A. I did.

16 Q. What was that advice?

17 A. There was the part about -- the wording  
18 changed over time, but the part that said that a number  
19 on the voter registration application had to be  
20 provided by the voter for a mail ballot application or  
21 a mail ballot. And we were trying our best to get them  
22 to not say that, to say a voter -- number in their  
23 record, voter registration record number instead of on  
24 their application because we didn't want voters to be  
25 confused into thinking they had to use whatever number

1 they originally registered to vote with, and that's not  
2 the case. We have got both numbers for most voters  
3 because we have worked real hard to get them. That's  
4 not necessary. It's just going to confuse things  
5 because the way we are going to implement this law is  
6 if they have got a number in the record we are going to  
7 tell the early voting ballot board and the early voting  
8 clerk to accept them.

9 Q. When you say a number on the voter  
10 registration, do you mean the VUID?

11 A. No, I mean a number that was supplied by  
12 the voter when they originally registered to vote. So  
13 if they gave their last four, chances are we have got  
14 the full nine now. If they gave their driver's  
15 license, probably we have the Social Security now as  
16 well. So we didn't want the language to tie the number  
17 that they had to provide as identification for their  
18 mail ballot process to be tied to the application  
19 because that was going to confuse voters because it's  
20 not true. We were going to look at whatever number is  
21 in their record.

22 Q. I see. So you were advising that as long  
23 as the voter provided a number that could be found in  
24 their record by the county, that it shouldn't  
25 necessarily have to match what was on the original

1 registration form?

2 A. That's right. We wanted to make that  
3 change. We talked about that in at least one committee  
4 hearing. I followed a tax assessor who made the same  
5 point.

6 Q. Was that change ultimately made?

7 A. I think it was in one place and it wasn't  
8 in another. So I think we still have some of that  
9 voter registration application language in here, but we  
10 have just maneuvered our way around it.

11 Q. Give me any other example that you have of  
12 advice that you offered around SB 1 and its provisions  
13 to legislators?

14 A. There were three provisions in SB 7 and  
15 later in SB 1 that we felt were very problematic for  
16 Texas elections that were an absolute show stopper,  
17 train wreck, will kill Texas elections. The first one  
18 was that any communication between the voting system  
19 vendor and our office was public information per se no  
20 exceptions. I said if y'all do that then source code  
21 is out there for bad guys. You cannot keep this  
22 without an exception. Ultimately exception was put in  
23 for critical infrastructure and proprietary  
24 information. That one was solved. The second one  
25 was --

1 Q. How about phones in polling places?

2 A. Uh-uh. The second one was like that, but it  
3 said that anything that's done on a central account  
4 computer has to be logged with a key logger. So it was  
5 going to require that we voluntarily insert a virus on  
6 our central account computers that of course has not  
7 been certified and would not be certified because it's  
8 a virus. And so we absolutely said you can't do that.  
9 What you need -- if you are talking about audit logs,  
10 we already have audit logs. Here's what an audit log  
11 looks like. It's complete. It tells who did it and  
12 what they did and when they did it. You don't need to  
13 add to an audit log, but we don't have audit log  
14 requirements in the law. If you would put a  
15 legislative history with the amendment. So Chairman  
16 Glick is the one that offered this amendment, and she  
17 did make this clear what they were talking about with  
18 that was an audit log. Okay. Great. We got that one  
19 solved.

20 The third one was write ones media  
21 requirement a/k/a WOMR. So the write ones media  
22 requirement is what they had in the bill and still have  
23 is a requirement that any device or system used in  
24 central count cannot be capable of reading a thumb  
25 drive or optical scan disk that can be written more



1 than once. There is no such thing. There never will  
2 be such a thing. Such a thing is a flying car. I told  
3 them you are going to kill Texas elections and make us  
4 go back to hand counted ballots if you keep that  
5 provision. The best I can do is get it kicked until  
6 September 26 effective date. So those were the three  
7 provisions that I was red in the face talking about.

8 Q. How about some of the other provisions? I  
9 mentioned allowing poll watchers to use video recording  
10 in polling places. Did you provide feedback on that?

11 A. I don't think we were ever asked about  
12 that.

13 Q. Okay. Of course I'm searching my mind  
14 because there were a lot of twists and turns on the  
15 legislation as it moved through the sessions. Were  
16 there any -- was there any feedback that you provided  
17 besides everything that you have just mentioned that  
18 the legislator did not resolve to your satisfaction? I  
19 know you mentioned in the last example you got at least  
20 an effective date to 2026. So there can be an effort  
21 to do an amendment before it goes into effect I  
22 presume?

23 A. Agreed.

24 Q. Was there anything you raised as a concern  
25 that ended up in SB 1 even though you were concerned

1 about it?

2 A. No, the three concerns that we raised were  
3 those three things. We got them either resolved or  
4 delayed.

5 Q. One more question that popped into my head.  
6 There was language originally in SB 1 talked about how  
7 a poll watcher couldn't be removed unless they violated  
8 the election code. But it didn't say anything about  
9 being able to remove a poll watcher for violating, for  
10 example, the penal code?

11 A. Right.

12 Q. Do you recall having any conversations with  
13 the committee about that?

14 A. Yes, but that was on the record at a  
15 hearing where I remember Representative Bucy and I had  
16 a pretty good colloquy about that.

17 Q. Can you think of any other conversations  
18 that were not in the public eye that related to  
19 provisions, for example, that you might understand  
20 being challenged in this lawsuit?

21 A. No.

22 MS. PERALES: I don't know how long we have been  
23 on, but it would be helpful for me to take a quick  
24 break.

25 MS. HUNKER: Sure.

1 (WHEREUPON, a recess was had.)

2 BY MS. PERALES:

3 Q. Mr. Ingram, the last set of questions that  
4 I have for you are about your change in job position.  
5 I want to follow up on some things that you said at the  
6 very beginning of the deposition regarding a March 9,  
7 2023 hearing that you testified at. Do you recall  
8 mentioning a March 9, 2023 hearing?

9 A. Yes.

10 Q. You mentioned an exchange with, I believe,  
11 it's Representative Swanson; is that correct?

12 A. That's correct.

13 Q. Can you tell me what specifically in the  
14 exchange led to the Secretary of State being not  
15 pleased?

16 A. It was the fact that I was frustrated with  
17 Representative Swanson for mischaracterizing my prior  
18 testimony.

19 Q. Can you -- was it then what you said or how  
20 you said it or some combination?

21 A. It was more how I said it than what I said.  
22 The fact that I was getting frustrated meant that maybe  
23 11 sessions is or 11 years 6 sessions you have had  
24 enough in front of the legislature because one thing  
25 you have got to do is keep your cool.

1 Q. In what way did Representative Swanson  
2 mischaracterize your testimony when she was speaking  
3 out loud there?

4 A. Sure. My previous exchange with  
5 Representative DeAyala was to the effect that this  
6 notwithstanding the challenges that the Harris County  
7 election had in '22, that November general election was  
8 the best one they had had since they had an election  
9 administrator. Representative Swanson took that to  
10 mean that I was saying the election in 2022 in Harris  
11 County was good. When in fact I was just saying it was  
12 the best one they had since they had an EA, which in  
13 fact is a very low bar. That's the one I wanted to  
14 make with Representative Swanson. I cut her off and I  
15 was a little short and that was my mistake.

16 Q. Do you -- were you -- when you were  
17 speaking though were you making accurate statements  
18 regarding the election in Harris County?

19 MS. HUNKER: Objection, form.

20 BY THE WITNESS:

21 A. I believe so.

22 BY MS. PERALES:

23 Q. Do you think your change in job roles was  
24 in any way a reaction to your having said that the 2022  
25 general election in Harris County was the best one they

1 have had since they got an EA?

2 MS. HUNKER: Objection, form.

3 BY THE WITNESS:

4 A. I don't think it was that so much as my  
5 reaction to Representative Swanson. I mean the whole  
6 idea was, "Keith, you have done your time. You have  
7 served well. You know, if you are going to get  
8 frustrated we can't take that chance. And obviously you  
9 are at a point in your career where it's a short fuse  
10 and we can't take the chance." So it's not like it was  
11 a punishment or anything like that. It's, "We want to  
12 protect you and we want to protect our office if you  
13 are going to be having trouble staying under control."

14 Q. In your new role will you still respond to  
15 questions from county election administrators about how  
16 to administer elections?

17 A. I'm not sure exactly what position. I mean  
18 how I'm going to do with the phones. That's yet  
19 undetermined.

20 Q. Do you know if you will be responding to  
21 any email inquiries from county election  
22 administrators?

23 A. Probably not.

24 Q. Do you know if you will be doing any  
25 trainings of county election officials?

1           A.       If I do it will be related to the voter  
2 cross-check system.

3           Q.       Do you know if you will be providing any  
4 legal analysis or legal interpretation of election code  
5 for The Secretary of State?

6           A.       If requested, sure. They have mentioned  
7 they would like me to do some research projects.

8           Q.       Prior to March of 2023, did Ms. Christina  
9 Adkins report to you?

10          A.       She did.

11          Q.       You mentioned earlier in the deposition you  
12 will now report to her?

13          A.       That's correct.

14          Q.       Is your position still described as  
15 director for Secretary of State?

16          A.       I do not believe so. I'm not sure if I'm  
17 project manager or an attorney five, but something  
18 other than a director four.

19          Q.       Do you know if there has been any change in  
20 your annual salary?

21          A.       It should stay the same.

22          Q.       Will your new duties turn in part on  
23 whether the Texas legislature enacts new legislation in  
24 this current session?

25          A.       Sort of, but not really. The sort of that

1 is that, you know, assuming that they pass legislation  
2 that makes the withdrawal from ERIC, which makes the  
3 need more pressing. But either way with ERIC losing  
4 members we need to fill those gaps. So probably there  
5 needs to be a supplemental system no matter what.

6 Q. Very clearly explained. Thank you. I  
7 think I understood what you said. It's a complicated  
8 topic.

9 A. Agreed.

10 MS. PERALES: I believe that I'm done. I will  
11 pass the witness. I think the next attorney is Victor  
12 Genecin if he's there. Shows him on screen.

13 MS. PERALES: Victor, are you there?

14 MR. GENECCIN: I'm here.

15 EXAMINATION

16 BY MR. GENECCIN:

17 Q. I believe I'm unmuted. Let's just see.  
18 Yes, I can either turn on the screen. Can you see me?

19 A. I can.

20 Q. Very good. So, Mr. Ingram, my name is  
21 Victor Genecin. I'm with NAACP LDF. We represent the  
22 Houston Area Urban League Plaintiffs here. I don't  
23 believe you and I have ever met, have we?

24 A. I don't believe so, no, sir.

25 Q. I'm sorry not to be able to meet you today

1 in person. Like Ms. Perales, if I go quiet it's  
2 because I'm eliminating questions from my outline.  
3 Unlike Ms. Perales if I suddenly start swearing, you  
4 should know it's not about you, it's about trying to  
5 make the technology work because I have got exhibits I  
6 would like to show you and I'm not convinced that I can  
7 do that properly. But to start I just have a few  
8 questions.

9 First of all, during the 2022 general  
10 election was any data collected by the State concerning  
11 the race of voters?

12 A. No.

13 Q. How about concerning the ethnicity of  
14 voters?

15 A. No.

16 Q. Am I correct that the State does not  
17 collect any such data?

18 A. Agreed.

19 Q. Turning to what happens after elections.  
20 Does your office conduct any of what I would call after  
21 action reports or after action meetings in which you  
22 get together with either people in your office or with  
23 the counties to discuss issues or problems they  
24 encountered during the election?

25 A. Yes, we do. We do a version of that



1 internally as well as with county advisory group.

2 Q. Who are the members of your county advisory  
3 group?

4 A. I will forget some. It's better if I just  
5 provide a list later then try to recall them off the  
6 top of my head.

7 Q. Why don't we do this. We will leave a  
8 blank in the transcript here and we can fill that in  
9 with your list. How's that?

10 A.  
11 That's fine. It's about 30 some odd  
12 counties.

13 Q. In terms of people with whom you meet  
14 internally after an election to conduct an after action  
15 group, who are those people?

16 A. It is our attorneys as well as our election  
17 trainers.

18 Q. In what form does that internal after  
19 election review take?

20 MS. HUNKER: Objection, form.

21 BY THE WITNESS:

22 A. It's just a meeting in the conference room  
23 and some people appear on TEAMS.

24 BY MR. GENECHIN:

25 Q. So it's a meeting, people talk?

1 A. That's right.

2 Q. Are there written reports collected?

3 A. No.

4 Q. Are minutes taken at the meeting?

5 A. No.

6 Q. Is anyone in the meeting taking notes?

7 A. Not usually. I mean there is sort of  
8 action items.

9 Q. So there are action items that come out of  
10 the meeting?

11 A. Usually.

12 Q. Do you circulate those internally?

13 A. No.

14 Q. Who has the action items?

15 A. Well, historically it's been Christina  
16 Adkins.

17 Q. Have Ms. Adkins' items coming out of the  
18 2022 general election been produced to us?

19 A. It's not a document to produce. It's -- I  
20 don't know. I doubt it.

21 Q. It's not a document?

22 A. No. I mean --

23 Q. Is there a list of items?

24 A. I don't know. I mean it's on a yellow note  
25 pad if it's anything. There is not any formal document

1 produced.

2 Q. For the record, we will request that those  
3 list of action items in whatever form they may be even  
4 if they are scribbled on a yellow note pad. We will do  
5 our best to see if we can read them.

6 Mr. Ingram, let me ask this. With regard  
7 to your meeting with your counties -- and what do you  
8 call that group?

9 A. The county advisory group.

10 Q. In terms of your after election meeting  
11 with the county advisory group, how does that meeting  
12 take place?

13 A. That's a phone call or I guess it's a  
14 Webex.

15 Q. In that meeting is there a discussion of  
16 what happened during the election?

17 A. Sure.

18 Q. People raise problems, right?

19 A. Sometimes, yes.

20 Q. People share lessons learned?

21 A. Usually, yes.

22 Q. Does anybody compile notes of what went on  
23 in that meeting?

24 A. Sometimes.

25 Q. How about with regard to the 2022 election?

1           A.       I don't know. I mean we have had several  
2 county advisory calls since that election.

3           Q.       Who would know if there are notes about  
4 what happened in the 2022 election?

5           A.       Well, anybody that's participating in the  
6 meeting.

7           Q.       So we would learn that from the list you  
8 provide?

9           A.       Well, the people on that list know whether  
10 they kept notes or not.

11          Q.       Are you aware of any notes being  
12 circulated?

13          A.       No.

14          Q.       Are the meetings with the county advisory  
15 are those the same or different than the meetings that  
16 you hold with events that are called the county  
17 information calls?

18          A.       I don't know what a county information call  
19 is.

20          Q.       Well, you indicated earlier in your  
21 testimony, maybe I got the words wrong, that you had a  
22 meeting every other week with the counties?

23          A.       We have a meeting every other week with our  
24 county advisory group.

25          Q.       Okay. So it's the county advisory group

1 you meet with every other week?

2 A. Agree with that. It's not a rigid  
3 schedule. It bows and flexes as we have legislative  
4 sessions and holidays.

5 Q. I guess in the run up to elections it may  
6 happen a little more frequently?

7 A. Usually it kind of goes the other way as we  
8 get close to an election.

9 Q. What's the content of your meeting with the  
10 county advisory group?

11 A. Depends upon what we have to talk about.  
12 Usually the format of meeting is that we start out with  
13 a topic or two that we think that they need to know  
14 about, and we want to solicit feedback on, and then  
15 open the floor up to whatever they want to bring up.

16 Q. Is there an agenda for the meetings with  
17 the county advisory group?

18 A. That's what I mean. Usually we start off  
19 with a couple things we want to talk about and those  
20 are listed on one slide, that that's the meeting.

21 Q. Have the slides of your office's  
22 presentations to the county advisory group been  
23 produced?

24 A. I don't know that any of them are relevant  
25 to anything in this case.

1 MR. GENECHIN: Well, I will just ask that the  
2 record reflect the request for the production of any  
3 slides shown to the county advisory group between May  
4 of 2022 and today's date.

5 BY MR. GENECHIN:

6 Q. Other than the slide that's put up it at  
7 the beginning of the meeting with the county advisory  
8 group, is there any other form of agenda that's  
9 circulated in advance of meeting?

10 A. No, not usually.

11 Q. So the first part of the meeting you have  
12 described which is presentation from Secretary of  
13 State's Office concerning whatever your office wants to  
14 present. What's the next part of the meeting?

15 A. Well, you have mischaracterized the first  
16 part. The first part often is things we want feedback  
17 on specifically. So it's not a presentation. It's a  
18 solicitation of feedback usually directed, you know, to  
19 a topic, but then there is an open mic, anybody can  
20 bring up anything that's on their mind.

21 Q. So in terms of the feedback that you  
22 request, have you requested feedback from the county  
23 advisory group concerning specific sections of SB 1?

24 A. We wouldn't characterize it that way.

25 Q. How would you characterize it?

1           A.       Well, if we want feedback on the corrective  
2       action procedure and how to improve it, we would ask  
3       the counties, "What did you think of the corrective  
4       action procedure? How would you improve it?" It's not  
5       an SB 1 related thing, it's a corrective action  
6       procedure question.

7           Q.       So if I understand correctly, you open the  
8       meeting with a request for feedback about a topic or  
9       topics that the Secretary of State's Office is looking  
10      for feedback about; is that right?

11          A.       Sometimes. And sometimes it is more of a  
12      presentation. This is what we are planning to do. But  
13      even if it's that. It's this is what we are planning  
14      to do. Can you think of anything else we need to do or  
15      anything we need to take off of this list? You know,  
16      it's talking about webinars that are upcoming. It's  
17      talking about all kinds of things that we are planning  
18      to train on and produce for the counties, documents  
19      that we are producing. All kinds of things that  
20      involve election administration that involve election  
21      administration that we have and advisory group so that  
22      we can bounce it off them before we send it to the  
23      whole list of counties.

24          Q.       Is there anybody within the the Secretary  
25      of State's Office who takes notes during the meeting

1 for the county advisory group?

2 A. Sometimes, yes.

3 Q. Who is that person or are those people?

4 A. There is usually notes that are taken by  
5 Lena Proft, one of our staff attorneys, and Alexa Bump  
6 Kemper, one of our trainers, but they are not on every  
7 call.

8 Q. Now, if neither of them is on the call how  
9 do you record the feedback that you have obtained from  
10 the counsel advisory group?

11 A. We don't.

12 Q. Well, I will request the production of any  
13 notes taken during the county advisory group meetings  
14 between May of 2022 and the present. I will ask that  
15 those be produced as well.

16 Do you have an understanding, Mr. Ingram,  
17 of when the counties assemble the packets of materials  
18 that their election judges are going to need during an  
19 election?

20 A. Well, I don't know what you mean by  
21 assemble.

22 Q. Am I correct that in order to do his or her  
23 job, an election judge needs certain materials?

24 A. Agreed.

25 Q. And that those include a handbook and whole



1 variety of forms?

2 A. Agreed.

3 Q. There are other materials as well an  
4 election judge is going to need in order to perform  
5 their duties?

6 A. There is different signs and stuff for the  
7 polling place, yes, sir.

8 Q. When do the election administrators put  
9 those materials together for each election judge?

10 MS. HUNKER: Objection, form.

11 BY THE WITNESS:

12 A. That's not a question that we answer. You  
13 would have to ask the county that.

14 BY MR. GENECCIN:

15 Q. Do you have an understanding of when they  
16 do it by?

17 MS. HUNKER: Objection, form.

18 BY THE WITNESS:

19 A. They do it before election day.

20 BY MR. GENECCIN:

21 Q. I understand that. I expect they do it  
22 before early voting as well; is that right?

23 A. Well, for the early voting locations, sure,  
24 but there is a lot fewer early voting locations than  
25 there are election day places.

1 Q. Have any of the counties discussed with you  
2 the issue of how much lead time they need to have their  
3 packets together for their election judges in advance  
4 of elections?

5 A. It's not usually counties that are asking  
6 that question. It's usually print vendors.

7 Q. And have the print vendors discussed that  
8 issue?

9 A. Sure.

10 Q. What have they said to you?

11 A. They need to have the list of forms by  
12 July.

13 Q. By July, that would be for a November  
14 election; is that right?

15 A. For a November election by July at the  
16 latest. They prefer it earlier than that.

17 Q. Do you attempt to avoid changes after you  
18 have gotten the list of forms out to the print vendors?

19 A. Yes.

20 Q. In the event that you have got a change  
21 that's got to be made, what do you do to make sure that  
22 the counties and election judges know that a form  
23 they've got has been replaced with something else?

24 A. We send a mass email.

25 Q. Now, are you familiar with the term wet

1 signature?

2 A. Yes.

3 Q. What does it mean?

4 A. It means the signature from an ink pen on a  
5 paper.

6 Q. Are there documents that are required under  
7 the election code to have a wet signature?

8 MS. HUNKER: Objection, form.

9 BY THE WITNESS:

10 A. Yes.

11 BY MR. GENECHIN:

12 Q. Are you able to tell me what those  
13 documents are?

14 A. Well, anything that's a voter registration  
15 form, there is several different documents that are  
16 actually voter registration forms such as a statement  
17 of residence, a provisional ballot, and a voter  
18 registration application.

19 Q. Any others that you can think of?

20 A. Application for ballot by mail.

21 Q. In the case of an application for ballot by  
22 mail, although that document can be submitted initially  
23 by fax or by email, the applicant has to follow it up  
24 with a hard copy, right?

25 MS. HUNKER: Objection, form.

1 BY THE WITNESS:

2 A. Agreed, unless it's an FPCA. Those can be  
3 sent electronically.

4 BY MR. GENECHIN:

5 Q. To your knowledge, are there any documents  
6 that are required by the election code to be signed but  
7 might need not have a wet signature on them?

8 A. Sure.

9 MS. HUNKER: Objection, form.

10 BY MR. GENECHIN:

11 Q. What are those documents?

12 A. It's just about everything else. 1007 of  
13 the election code says unless it's otherwise specified  
14 anything required can be sent electronically or by fax.

15 Q. Now, you remember at the very beginning of  
16 your testimony this morning you said that in  
17 preparation for your testimony today you reviewed  
18 spreadsheets of ballot rejections?

19 A. Agreed.

20 Q. What are the names of those spreadsheets?  
21 What are they called?

22 A. I have no idea.

23 Q. How do you know what they were?

24 A. Well, because I can look at them and see  
25 what's in them. It's one excel spreadsheet with

1 several pages for different elections.

2 Q. You testified that parts of that document  
3 were produced. Do you know which parts were produced?

4 A. That's not what I said, sir.

5 Q. Then I'm sorry. If it's not what you said,  
6 please correct me.

7 A. The whole thing has been produced as far as  
8 I know.

9 Q. What information is shown on the  
10 spreadsheet that you reviewed in preparation for your  
11 testimony?

12 A. The ballot rejection rates by county for  
13 each of the elections held in 2022, the democratic and  
14 republican primary elections, the constitutional  
15 amendment election in May, the primary runoffs for  
16 democrats and republicans in May, and the general  
17 election in November.

18 Q. You also testified this morning that you  
19 spoke with Ms. Davidson of the republican party of  
20 Texas?

21 A. Agree with that.

22 Q. You said that was to ask her about an  
23 incident involving a poll watcher in North Hidalgo  
24 County?

25 A. That's correct.

1 Q. Why did you speak particularly to Ms.  
2 Davidson?

3 A. Because she is one of the ones that I  
4 called with regard to the original incident back in  
5 October of '22.

6 Q. And how do you know that she is one of the  
7 ones you called?

8 A. Because I remember.

9 Q. Do you remember calling her? Do you have  
10 any kind of note or memo about the content of your call  
11 with her?

12 A. I do not. I looked for it. I didn't find  
13 it.

14 Q. Do you remember speaking with anybody else  
15 about this particular incident?

16 A. Sure. I talked to people in our executive  
17 office as well as Christina.

18 Q. What do you remember about that incident?

19 A. Just what I have already told you, there  
20 was an issue with the poll watcher, but I don't  
21 remember the nature of the issue.

22 Q. So you remember there was an issue with a  
23 poll watcher, you remember calling Ms. Davidson about  
24 it, you remember speaking with some other people about  
25 it, but you don't remember what the issue was?

1           A.           That's correct. I remember Ms. Davidson  
2 whenever I talked to her, I talked to her a couple of  
3 times or three times about this incident. She  
4 mentioned that there was an early voting clerk in  
5 Weslaco or maybe Pharr that was she thought being  
6 problematic in some way. I don't remember what it was.  
7 I also talked to -- so I talked to Gloria, who was the  
8 acting elections administrator for Hidalgo County about  
9 that, and that both issues were successfully resolved.

10          Q.          Does your office have any written record of  
11 either of those issues?

12          A.          We do not.

13          Q.          Do you recall during either early voting  
14 before the November election of 2022 or in connection  
15 with the November 2022 general election any other  
16 problems with poll watchers?

17          A.          There was an incident in Dallas County  
18 where a poll watcher was asked to show ID and they  
19 refused to do so and it escalated so that both sides,  
20 both the poll watcher and the election judge, called  
21 the sheriff's office.

22          Q.          Do you remember anything else about that  
23 incident?

24          A.          No.

25          Q.          Do you remember what happened after the

1 sheriff's office was called?

2 A. Well, we were contacted and we were asked  
3 whether they needed to show ID, and said the law  
4 doesn't require it. The election judge or early voting  
5 clerk allowed the poll watcher to enter the polling  
6 location.

7 Q. The matter was resolved?

8 A. The matter was resolved.

9 Q. Do you have any written record of that?

10 A. Not that I know of, no, sir.

11 Q. Do you have -- do you have any recollection  
12 of any other issues involving poll watchers during the  
13 November 2022 election?

14 A. Do you mean issues with the poll watcher  
15 interacting with election officials?

16 Q. Any complaints about the behavior of poll  
17 watchers?

18 A. Yes, there weren't any. I don't remember  
19 anything, but it would have been whatever is normal in  
20 an election.

21 Q. What's normal in an election?

22 A. Normally we have a few reports where the  
23 poll watchers and the election officials have a  
24 disagreement about what can and can't be viewed or how  
25 close people can be.



1 Q. Does your office keep any records of any  
2 such disputes or complaints?

3 A. No. I do remember that in November of '22  
4 the number of those complaints was much decreased. We  
5 attributed that to our required poll watcher training  
6 that was put in place by SB 1.

7 Q. Now, you testified that late ballots are  
8 not classified as rejections, they are just late; do  
9 you recall that testimony?

10 A. I do.

11 Q. Are any records kept of ballots by mail  
12 that are received too late to be counted?

13 A. Well, the records for the election  
14 including the late mail ballots are preserved for 22  
15 months. So the counties have them.

16 Q. The counties have those late mail ballots?

17 A. If they received them, yes.

18 Q. Are those -- the mail ballots, do we know  
19 how many of them there were in the 2022 election?

20 A. It's not -- that's not a number that's kept  
21 anywhere. That's not a number that's recorded. I  
22 think some counties if they are received pretty early  
23 on before the canvas or whatever do classify them as  
24 rejected, do send a rejection notice that your ballot  
25 was received after the deadline. But there is not a

1 legal requirement they do it, and not all counties do  
2 it. There is no time period during which they are  
3 supposed to do it.

4 Q. Are there any statistics at all concerning  
5 ballots that are received too late to be counted?

6 A. The counties would have those.

7 Q. If there are any?

8 A. If there are any.

9 Q. You said this morning that breakdown county  
10 by county of rejected ballots has been produced in this  
11 litigation. I would ask you, do you know what that  
12 county by county breakdown of rejections is called?

13 MS. HUNKER: Objection, form, asked and answered.

14 BY THE WITNESS:

15 A. You just asked me that question. I don't  
16 know the name of it.

17 BY MR. GENECHIN:

18 Q. Do you know how it is done? How do you  
19 prepare -- how does your office prepare the county by  
20 county breakdown of rejections?

21 A. I don't know how it's prepared.

22 Q. Do you know what the data is that's the  
23 basis for it?

24 A. The information inputted into TEAM from the  
25 counties.

1 Q. So would it be fair to say each county puts  
2 into TEAM the number of rejections of mail-in ballots  
3 that it performed?

4 A. Not exactly not that way. They --

5 Q. How does --

6 A. They are required to record when an  
7 application for a ballot by mail is received, action  
8 taken on that application for ballot by mail, when the  
9 mail ballot is mailed to the voter, and when the mail  
10 ballot is received from the voter, and whether or not  
11 it is ultimately accepted or rejected. So we in TEAM  
12 can run a report for the number that are rejected by  
13 county. The county doesn't do that work. TEAM does  
14 that work for us.

15 Q. Would it be fair to say that the  
16 spreadsheet that you talked about is a spreadsheet that  
17 shows information that's been pulled from TEAM?

18 A. Agree with that.

19 Q. You told us a little bit earlier today that  
20 some voters get notice of defects in their ballot by  
21 mail after the clock has run out. Do you recall that  
22 testimony?

23 A. I do.

24 Q. Can you tell us how it would happen that  
25 they would get the notice of the defects too late for

1       them to cure?

2               MS. HUNKER:   Objection, form.

3       BY THE WITNESS:

4               A.           For instance, I heard from Starr County in  
5       the general election in November of '22 that their  
6       ballot board was planning to send the notice of defect  
7       after their last ballot meeting, which would happen  
8       after the deadline for curing mail ballots. I informed  
9       the election administrator in Starr County that was not  
10      acceptable, and that they needed to get those notice of  
11      defects right now so that the voter might have a chance  
12      to fix the problem.

13      BY MR. GENECCIN:

14              Q.           When you say right now, when was that  
15      conversation taking place?

16              A.           It was shortly after the election, maybe on  
17      Wednesday or Thursday.

18              Q.           How much time at that point did the voters  
19      have left to cure?

20              A.           Until Monday.

21              Q.           To your knowledge, did they have to get  
22      those out right now as you asked them to?

23              A.           As far as I know. But I don't have any way  
24      to check.

25              Q.           Can you describe to me any other ways that

1 voters would get notice of defects after the clock has  
2 run out?

3 A. Well, the post office delays the delivery  
4 then they got it late.

5 Q. Is there any way to know how many voters  
6 got notice of defects too late to cure?

7 A. No idea.

8 Q. I take it the thing that's knowable is when  
9 notice was sent to voters of the defects in their  
10 ballots; is that right?

11 MS. HUNKER: Objection, form.

12 BY THE WITNESS:

13 A. It's knowable by the counties. It's not  
14 knowable by our office.

15 BY MR. GENECHIN:

16 Q. Is that one of the pieces of information  
17 that's sent to TEAM?

18 A. No.

19 Q. The counties are not required to enter into  
20 TEAM any information concerning the date on which a  
21 ballot was rejected?

22 A. That's not what I said, sir. Don't twist  
23 my words.

24 Q. Please. I'm not trying to twist your  
25 words. I'm trying to understand this. You have been

1 doing this a long time. I haven't. I'm just trying to  
2 understand.

3 Are the counties required to enter the date  
4 of rejection of a ballot into TEAM?

5 A. Yes.

6 MS. HUNKER: Objection, form.

7 BY MR. GENECHIN:

8 Q. And so are the counties required to enter  
9 the date of notification to the voter of the rejection  
10 of their ballot into TEAM?

11 MS. HUNKER: Objection, form.

12 BY THE WITNESS:

13 A. I want to make sure we are communicating  
14 here. Rejection to me means a final rejection after  
15 the time period for cure has elapsed. What we are  
16 talking about I think is notice of defect before there  
17 is a finality to it, right?

18 BY MR. GENECHIN:

19 Q. Right. Thank you for the correction.

20 A. So the notice of defect status is not  
21 entered into the ballot tracker.

22 Q. Okay.

23 A. The interim stages are not kept.

24 Q. So it's not possible to reconstruct from  
25 TEAM what those interim stages were?

1 A. Agreed.

2 Q. Right. Or what efforts were made, if any,  
3 to notify the voter that his or her ballot could be  
4 cured?

5 A. Agreed.

6 Q. Now, you also spoke earlier today about  
7 concept of not trusting the post office?

8 A. Agreed.

9 Q. I would ask you why in your view should  
10 voters not trust the post office?

11 MS. HUNKER: Objection, form.

12 BY THE WITNESS:

13 A. The post office is suffering under budget  
14 constraints that have grown worse and worse and worse  
15 over time such that their service delivery times where  
16 they guarantee delivery by a certain date have  
17 increased and gotten longer and longer and longer.  
18 That means that their expected time of delivery, the  
19 first class mail is now five to seven days. And just  
20 because that's their service delivery time, doesn't  
21 mean that's what they always do. Sometimes it takes a  
22 lot longer than that.

23 BY MR. GENECHIN:

24 Q. I guess it would be fair to say in a  
25 situation where there are short deadlines it's hard to

1 have confidence that people will receive notices by  
2 mail?

3 A. I would say -- --

4 MS. HUNKER: Objection, form.

5 BY THE WITNESS:

6 A. I would say by mail is sort of the last  
7 choice if you want to have actual notice. The best  
8 idea is for ballot boards to meet earlier and to send  
9 notice earlier.

10 BY MR. GENECHIN:

11 Q. I think you said earlier today that 93,800  
12 Texas voters have either a driver's license or a Social  
13 Security number on file; is that right?

14 A. In their voter registration record.

15 Q. And what percentage is that 93,800 people?  
16 What percentage is that of the total of electorate in  
17 Texas?

18 A. It's roughly half a percent.

19 Q. How many registered voters all together  
20 does Texas have on the RULES?

21 A. About 17 1/2 million, give or take.

22 Q. For the 2022 general election did your  
23 office hire temporary staff?

24 A. We did not.

25 Q. In connection with the enactment of SB 1



1 and in order to comply with it did your office add  
2 staff?

3 A. We did not.

4 Q. Did your office acquire additional  
5 equipment of any kind in connection with the enactment  
6 of SB 1 in order to comply with it?

7 A. We did not.

8 Q. Did you require additional equipment for  
9 the 2022 general election?

10 MS. HUNKER: Objection, form.

11 BY THE WITNESS:

12 A. We did not.

13 BY MR. GENECHIN:

14 Q. Did your office maintain a hotline for  
15 complaints during the 2022 general election?

16 A. Can we back up one second. One thing that  
17 we did to comply with SB 1 is it's not an acquiring of  
18 new equipment, but we did expand the capability of  
19 Texas.gov to be able to register voters electronically  
20 into a new county. So it's not acquisition of new  
21 equipment, but it is new capability of existing  
22 equipment so that voters could update their  
23 registration electronically into new counties. It's a  
24 version of electronic voter registration for people who  
25 are registered to vote.

1 Q. Did that expansion of capacity of existing  
2 equipment require the assistance of software engineers  
3 or other technical people?

4 A. It's something that we did with the  
5 Department of Information Resources and their vendor  
6 Deloitte. Deloitte would be the one who had to  
7 actually hire any technical people to perform the  
8 change.

9 Q. Do you know what that project cost?

10 MS. HUNKER: Objection, form.

11 BY THE WITNESS:

12 A. Roughly 100,000. But because we spent that  
13 money there were more voter registrations that were  
14 done electronically, which meant that we didn't have to  
15 hire temporary workers to sort paper applications,  
16 which is what we have had to do before every other  
17 general election since I have been in this job.

18 BY MR. GENECHIN:

19 Q. Turning to complaints. Did your office  
20 maintain a hotline for complaints during the general  
21 election in 2022?

22 A. We have a hotline for anything the public  
23 wants to talk to us about.

24 Q. Who staffs that hotline?

25 A. We do.

1 Q. Are the calls to that hotline recorded in  
2 any way?

3 A. They are not.

4 Q. Is any written record kept of those calls?

5 A. There is not.

6 Q. Focusing specifically on complaints related  
7 to the election. Do you keep a written record of  
8 those?

9 A. So I don't know what you mean by  
10 complaints. You mean if somebody calls to complain  
11 that a poll worker was rude to them, there won't be a  
12 record of that. But if they send in an election log  
13 complaint that says the poll worker was rude to me, we  
14 will have a record of that. We do maintain a log of  
15 election log complaints that we receive before an  
16 election, during election, after election, but people  
17 who phone call, we don't keep a record of those.

18 Q. So when you say an election log complaint,  
19 is that done on a specific form or is that just a  
20 complaint in writing?

21 A. Before SB 1 it was on a specific form.  
22 After SB 1 the form can be anything that's in writing.

23 Q. So people can send you emails, they can  
24 send you letters?

25 A. They can and they do.

1 Q. Do they send you texts?

2 A. Not usually.

3 Q. Okay. The email and letters are saved; is  
4 that right?

5 A. They are and there is a log kept of those.

6 Q. Who keeps that log?

7 A. My assistant or my former assistant, Kate  
8 Fisher.

9 Q. We will request that that log for period of  
10 the 2022 general election be produced.

11 A. Sir, with the caveat that we still get  
12 complaints about the '22 election.

13 Q. Well, I guess what we will do is we will  
14 request that the log to date be produced.

15 A. Okay.

16 Q. Can you tell me approximately how many  
17 complaints you received in connection with the 2022  
18 general election?

19 A. I don't have that number at hand.

20 Q. Are you able to approximate it?

21 A. No.

22 Q. It doesn't matter because you will produce  
23 the log and we will see the exact number.

24 A. Yes, I would rather you do that because I  
25 don't know. I know it's been a lot. I know there is a

1 lot that haven't been reviewed yet so.

2 MS. HUNKER: For clarification of the record, I  
3 believe this complaint log at least an earlier version  
4 was produced. To the extent that the complaint logs  
5 are produced, there would probably some redactions due  
6 to investigator privilege. Any type of referrals that  
7 would have been forwarded to the Attorney General's  
8 Office that are currently being processed would still  
9 fall under that privilege.

10 MR. GENECHIN: Thanks very much for that  
11 clarification.

12 BY MR. GENECHIN:

13 Q. Let me ask this. Does the log reflect  
14 receipt of complaints or does it -- or are entries made  
15 only when the complaints have been resolved in some  
16 way?

17 A. It has received as well as resolution.

18 Q. Would you know how many complaints of  
19 fraudulent activity? Do you know how many complaints  
20 concerning fraudulent activity your office received in  
21 connection with the general election for 2022?

22 MS. HUNKER: Objection, form.

23 BY THE WITNESS:

24 A. I do not as we sit here today.

25 BY MR. GENECHIN:

1 Q. Do you know as of today approximately how  
2 many referrals your office has made to the Attorney  
3 General for fraudulent activities in connection with  
4 the 2022 general election?

5 MS. HUNKER: Objection, form.

6 BY THE WITNESS:

7 A. I do not.

8 BY MR. GENECCIN:

9 Q. Can you tell me approximately?

10 A. I don't know. I don't want to guess.

11 Q. Are you aware, sir, of any fraudulent  
12 activity that you believe was reduced in the 2022  
13 general election compared with the 2018 general  
14 election as a result of any section of SB 1?

15 MS. HUNKER: Objection, form.

16 BY THE WITNESS:

17 A. Yes, I don't know.

18 MR. GENECCIN: I'd like to take just a brief break  
19 if it's a good time.

20 MS. HUNKER: That works.

21 (WHEREUPON, a recess was had.)

22 BY MR. GENECCIN:

23 Q. So, Mr. Ingram, does the -- well, not does.  
24 I will withdraw that.

25 For the 2022 general election, did the

1 Texas Secretary of State track rejections of  
2 applications for ballots by mail?

3 A. We had the capacity to do so if the  
4 counties entered the information. What we found is  
5 that not all counties were entering the application  
6 information.

7 Q. What counties were not entering? Do you  
8 have a way of knowing which counties were and were not  
9 entering that information?

10 A. I can't think of a good way to get that  
11 information. We don't know if we don't have because  
12 there wasn't any or because they didn't enter it.

13 Q. How did you find out there were counties  
14 not entering this information?

15 A. Because they are entering ballot by mail  
16 information without an application information.

17 Q. Was it your understanding that the counties  
18 were supposed to enter the application information?

19 A. Yes.

20 Q. What efforts, if any, did your office  
21 undertake to contact those counties that were not  
22 entering the information to say we need that  
23 information to be entered?

24 A. Well, we would call them.

25 Q. Do you have a list of the counties that did

1 not provide the information?

2 A. Not that I know of. We might have had a  
3 list at the time, but we don't now.

4 Q. Is there a report you could run in -- from  
5 TEAM that would show length for certain counties for  
6 the applications for ballot by mail?

7 A. I don't know. I don't think so, but maybe.

8 Q. In connection with the 2022 general  
9 election, did the Texas Secretary of State's Office  
10 track rejections of ballots in the general election?

11 MS. HUNKER: Objection, form.

12 BY THE WITNESS:

13 A. So we were required by House Bill 1382 in  
14 regular session as modified by SB 1 to have in place a  
15 method for ballots to be tracked by voters, and the  
16 activity with regard to those ballots to be tracked by  
17 voters.

18 BY MR. GENECCIN:

19 Q. Is that the information that you provided  
20 to voters, is that -- is it possible to collect that  
21 information statistically to see numbers of rejections?

22 A. Well, we have what information was put into  
23 the tracker by the counties.

24 Q. Does TEAM include a field for counties to  
25 input the reason code for the rejection and application



1 for ballot by mail?

2 MS. HUNKER: Objection, form.

3 BY THE WITNESS:

4 A. Yes.

5 BY MR. GENECCIN:

6 Q. Does TEAM include a field for counties to  
7 input a reason code for the rejection of a ballot  
8 itself?

9 MS. HUNKER: Objection, form.

10 BY THE WITNESS:

11 A. Yes.

12 BY MR. GENECCIN:

13 Q. Does the Secretary of State's Office put  
14 out a guide instructing the counties which reason code  
15 to use for these rejections?

16 A. We have trainings and we have manuals for  
17 the usage of team, yes, sir.

18 Q. To your knowledge, has your office produced  
19 the manual with the reason codes for rejections of  
20 ABBM, application for ballot by mail?

21 A. Yes. By publishing I mean it's on our TEAM  
22 doc share website.

23 MS. HUNKER: For clarification of the record,  
24 there are some manuals and training materials for TEAM  
25 that can only be produced to the United States when

1 requested because of the protective order and the  
2 agreement to extent it shows the infrastructure of TEAM  
3 that could lead to a compromise in the integrity of  
4 that system.

5 MR. GENECHIN: With that I will reserve the  
6 remainder of my questions for the 30(b)(6) deposition  
7 and pass the witness.

8 MS. HUNKER: Are there any other Plaintiff groups  
9 on the Zoom that have questions for the witness? Are  
10 there any other parties on Zoom that have questions for  
11 the witness?

12 State Defendants will reserve any questions  
13 for trial. We can close out the deposition. We would  
14 ask to read and sign.

15 (Deposition concluded at 4:18 p.m.)  
16  
17  
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19  
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21  
22  
23  
24  
25

Keith Ingram

March 28, 2023  
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## CHANGES AND SIGNATURE

KEITH INGRAM

March 28, 2023

PAGE/LINE

CHANGE

REASON

1 I, KEITH INGRAM, have read the foregoing  
2 deposition and hereby affix my signature that the same  
3 is true and correct, except as noted on the previous  
4 page.

5  
6 \_\_\_\_\_  
7 KEITH INGRAM

8 THE STATE OF \_\_\_\_\_)

9 COUNTY OF \_\_\_\_\_)

10 Before me, \_\_\_\_\_, on this day  
11 personally appeared KEITH INGRAM, known to me (or  
12 proved to me under oath or through \_\_\_\_\_)  
13 (description of identity card or other document) to be  
14 the person whose name is subscribed to the foregoing  
15 instrument and acknowledged to me that he executed the  
16 same for the purposes and consideration therein  
17 expressed.

18 Given under my hand and seal of office this \_\_\_\_\_  
19 day of \_\_\_\_\_, 20\_\_\_\_.

20  
21 \_\_\_\_\_  
22 NOTARY PUBLIC IN AND FOR

23 THE STATE OF \_\_\_\_\_

24 COMMISSION EXPIRES: \_\_\_\_\_  
25

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE WESTERN DISTRICT OF TEXAS  
3                   SAN ANTONIO DIVISION  
4                   LA UNION DEL PUEBLO ENTERO,                   )  
5                   et al.,                   )  
6   Plaintiffs,                   )  
7                   vs.                   ) Civil Action No.  
8                   STATE OF TEXAS, et al.,                   ) 5:21-cv-844(XR)  
9   Defendants.                   ) (Consolidated Cases)

7                   REPORTER'S CERTIFICATION  
8                   ORAL DEPOSITION OF  
9                   KEITH INGRAM  
10                   March 28, 2023

10                   I, Dana Shapiro, a Certified Shorthand Reporter,  
11                   hereby certify to the following:

12                   That the witness, KEITH INGRAM, was duly sworn by  
13                   the officer and that the transcript of the oral  
14                   deposition is a true record of the testimony given by  
15                   the witness;

16                   I further certify that pursuant to FRCP Rule  
17                   30(e)(1) that the signature of the deponent:  
18                   was requested by the deponent or a party before the  
19                   completion of the deposition and that the signature is  
20                   to be before any notary public and returned within 30  
21                   days from date of receipt of the transcript. If  
22                   returned, the attached Changes and Signature Pages  
23                   contain any changes and reasons therefore;

24                   I further certify that I am neither counsel for,  
25                   related to, nor employed by any of the parties or

Keith Ingram

March 28, 2023  
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1 attorneys in the action in which this proceeding was  
2 taken, and further that I am not financially or  
3 otherwise interested in the outcome of the action.

4 Certified to by me this April 10, 2023.

5 *Dana Shapiro*  
6

7 Dana Shapiro  
8 Illinois CSR 84-3597  
9 Expiration: 5/31/23  
10 Magna Legal Services  
11 Firm Registration No. 633  
12 1635 Market Street  
13 8th Floor  
14 Philadelphia, PA 19103  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 COUNTY OF TRAVIS )

2 STATE OF TEXAS )

3 I hereby certify that the witness was notified on  
4 \_\_\_\_\_, that the witness has 30 days  
5 after being notified by the officer that the transcript  
6 is available for review by the witness and if there are  
7 changes in the form or substance to be made, then the  
8 witness shall sign a statement reciting such changes  
9 and the reasons given by the witness for making them;

10 That the witness' signature was/was not returned  
11 as of \_\_\_\_\_.

12 Subscribed and sworn to on this \_\_\_\_\_ day of  
13 \_\_\_\_\_, 20\_\_\_\_.

14  
15 \_\_\_\_\_  
16 Dana Shapiro  
17 Illinois CSR 84-3597  
18 Expiration: 5/31/23  
19 Magna Legal Services  
20 Firm Registration No. 633  
21 1635 Market Street  
22 8th Floor  
23 Philadelphia, PA 19103  
24  
25

Keith Ingram

March 28, 2023

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